

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**PRINTFLY CORPORATION d/b/a
RUSH ORDERTEES.COM,**

Plaintiffs,

v.

**DEKEO, INC.,
and
JIFFYSHIRTS.COM US, L.P.,**

Defendants.

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Civil Action No.: 2:20-cv-00732-GEKP

**DEFENDANTS', DEKEO, INC. AND JIFFYSHIRTS.COM US, L.P., MOTION TO
DISMISS AND MEMORANDUM OF LAW UNDER RULES 12(b)(6) AND 12(f)**

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Dated: February 18, 2020

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**IN THE UNITED STATES DISTRICT COURT
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**PRINTFLY CORPORATION d/b/a
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Plaintiffs,

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**DEKEO, INC.,
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Civil Action No.: 2:20-cv-00732-GEKP

ORDER

AND NOW, this _____ day of _____, 2020, upon consideration of Defendants' Motion to Dismiss Pursuant to Rule 12(b)(6) and in the alternative Rule 12(f) of the Federal Rules of Civil Procedure, and the response thereto, it is hereby **ORDERED** that the Motion is **GRANTED**; and it is **FURTHER ORDERED** that Counts I, II and III of Plaintiff's Amended Complaint are **DISMISSED WITH PREJUDICE**.

BY THE COURT:

J.

**IN THE UNITED STATES DISTRICT COURT
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**DEKEO, INC.,
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DEFENDANTS' MOTION TO DISMISS

Defendants, Dekeo, Inc. (“Dekeo”) and Jiffyshirts.com US, L.P. (“Jiffy”) (collectively, the “Defendants”), by and through their counsel, Sidkoff Pincus & Green, P.C., hereby move to dismiss Plaintiff’s Amended Complaint pursuant to Rule 12(b)(6) and in the alternative Rule 12(f) of the Federal Rules of Civil Procedure, for the reasons set forth in detail in the accompanying Memorandum of Law.

WHEREFORE, Defendants respectfully request that this Court grant their Motion to Dismiss Plaintiff’s Amended Complaint with prejudice.

Respectfully submitted,

Dated: February 18, 2020

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**IN THE UNITED STATES DISTRICT COURT
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PRINTFLY CORPORATION d/b/a RUSH ORDERTEES.COM,	:	
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<i>Plaintiffs,</i>	:	
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v.	:	Civil Action No.: 2:20-cv-00732-GEKP
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DEKEO, INC., and JIFFYSHIRTS.COM US, L.P.,	:	
	:	
	:	
<i>Defendants.</i>	:	

**DEFENDANTS’ MEMORANDUM OF LAW
IN SUPPORT OF THEIR MOTION TO DISMISS**

Defendants, Dekeo, Inc. (“Dekeo”) along with Jiffyshirts.com US, L.P. (“Jiffy”) (collectively, the “Defendants”), by and through their counsel, Sidkoff Pincus & Green, P.C., hereby submit their Memorandum of Law in Support of their Motion to Dismiss the Amended Complaint of Plaintiff, Printfly Corporation d/b/a RushOrderTees.com (“Plaintiff”).

I. STATEMENT OF FACTS

A. Procedural History

On May 22, 2019, Plaintiff initiated suit by filing a Complaint against Defendants in the Court of Common Pleas of Philadelphia County, Pennsylvania (“Philadelphia County Court”). On November 1, 2019, Plaintiff filed a Motion to Amend the Complaint, which was granted on January 15, 2020. The Amended Complaint was then docketed on the same date.¹ On February 10, 2020, Defendants timely removed the case from the Philadelphia County Court to this Court by filing a Notice of Removal. *See* ECF Doc. No. 1.

¹ A copy of the Amended Complaint is attached hereto as Exhibit “1”.

The instant Motion to Dismiss (the “Motion”) seeks to dismiss Plaintiff’s Amended Complaint, which asserts claims for false and deceptive advertising pursuant to the Lanham Act, 15 U.S.C. § 1125(a)(1)(B) (Count I), false and deceptive advertising pursuant to the Lanham Act, 15 U.S.C. § 1125(a)(1)(A) (Count II)², and Pennsylvania common law unfair competition (Count III). Dismissal is appropriate here because: (1) Plaintiff lacks statutory standing to sue under the Lanham Act, and (2) Plaintiff failed to state claims upon which relief can be granted for all claims. In the alternative, the allegations in ¶¶ 13, 122–26 should be stricken in their entirety because they are impertinent, immaterial, and scandalous.

B. Plaintiff’s Allegations in the Amended Complaint³

The Defendants’ business

Dekeo and/or Jiffy used to operate two separate websites, www.jiffyshirts.com and www.dekeo.com. *See* Am. Compl., ¶ 4. At some point, www.dekeo.com no longer existed and was relocated to a new web address, www.jiffyshirts.com/print. *See id.* The website jiffyshirts.com sells and ships blank clothing apparel. *See id.*, ¶ 5. The other website, jiffyshirts.com/print (formerly dekeo.com), is a marketplace of companies that design, print and embroider on apparel. *See id.*, at ¶ 8. Plaintiff alleges the resale of blank apparel is considered a “commodity” business because the product remains the same regardless of which company the customer purchases from. *See id.*, at ¶ 20. For example, a Gildan G500 t-shirt will have the same characteristics regardless of which company the consumer purchases from. *See id.*, at ¶ 21.

² Although Plaintiff also labels this count as a false and deceptive advertising claim, this section of the Lanham Act is meant for “false designation of origin” claims. *See Parks LLC v. Tyson Foods, Inc.*, 863 F.3d 220, 226 (3rd Cir. 2017).

³ Defendants accept the allegations in Plaintiff’s Amended Complaint as true for purposes of this Motion to Dismiss *only*.

Plaintiff claims that Jiffy “holds itself out as a leading online reseller of blank apparel, selling approximately ten times as much product as its nearest competitor through its website.” *See id.*, at ¶ 23. However, Plaintiff claims that Defendants have succeeded by allegedly making “countless misrepresentations” about pricing, quality, discounts, sales and advertisements through their website.⁴ *See id.*, at ¶ 24.

Plaintiff identifies three types of advertising claims allegedly made by Defendants. First, general claims of superiority regarding Defendants’ services and goods sold by Defendants. Second, allegedly misleading pricing and sales information. Third, issues with subjective product reviews posted on Defendants’ website. Nowhere does Plaintiff allege Defendants are making false comparisons to Plaintiff’s goods or services or are misleading consumers into choosing Defendants’ goods and services over those of Plaintiff.

General claims of superiority

Defendants’ advertisements and websites contains claims of general superiority that Plaintiff alleges are misleading based on their language. *See id.*, at ¶¶ 48–62. Searching on Google for “jiffyshirts” will allegedly result in a description that “JiffyShirts.com has the lowest prices fastest delivery.” *See id.*, at ¶ 48. Plaintiff disputes the validity of other public claims made by Defendants on their website, such as “Always in Stock,” “The Fastest Delivery,” “Cheapest Prices,” and “Lowest Prices.” *See id.*, at ¶ 50. By way of example, Plaintiff claims other competitors⁵ of Defendants have lower prices once other costs are factored in, Defendants run out of stock at times, and nothing suggests Defendants’ delivery is the fastest. *See id.*, at ¶¶ 51–62. Plaintiff claims these alleged misrepresentations were knowingly made by Defendants

⁴ It is worth mentioning that Plaintiff makes no allegations that Defendants compare their own products to Plaintiff’s or attempt to mislead consumers into choosing their own products over Plaintiff’s.

⁵ Notably, Plaintiff admits it is not a competitor of Jiffy. *See id.*, at ¶ 55.

and have potentially harmed consumers, the entire retail apparel industry, and Plaintiff's subsidiary (a non-party). *See id.*, at ¶¶ 60–62.

Additionally, Defendants label a selection of shirts as “Best Quality T-Shirts” that allegedly have no factual basis to support that distinction. *See id.*, at ¶¶ 63–67. For example, one of the shirts in this category has a single five-star rating. *See id.*, at ¶ 65. Another shirt, which has over seventeen thousand reviews and a four-and-a-half-star rating does not appear on the “Best Quality” list. *See id.*, at ¶ 66. Instead, Plaintiff claims that Defendants only label these shirts as such because they provide a better profit margin than other shirts. *See id.*, at ¶ at 68. Further, Plaintiff alleges that there are a number of other labels Defendants use in order to increase search engine results and to confuse consumers, such as: “Softest Cotton,” “Most Fashionable,” “Best Men’s Performance Products,” “Best Women’s Performance Products,” and “Best Women’s Sweatshirts.” *See id.*, at ¶¶ 69–70. Plaintiff claims Defendants know these statements are inaccurate and knowingly make them to deceive consumers, and harm the entire retail apparel industry and Plaintiff's subsidiary (a non-party). *See id.*, at ¶¶ 71–73.

Plaintiff alleges the “Contact Us” web page identifies services that Defendants incorrectly claim only they provide. *See id.*, at ¶ 88. Plaintiff alleges Defendants are not the only company that provides this information and services, making these statements misleading. *See id.*, at ¶¶ 89–97. For example, Plaintiff alleges Defendants incorrectly claim they check their warehouses for shipping and delivery information, which apparently misleads consumers into thinking they have a physical location, when they do not own their own warehouse, but instead use the same warehouses as most of the rest of the industry. *See id.*, at ¶¶ 94–95. Somehow, this alleged conduct harms consumers, the entire retail apparel industry, and Plaintiff's subsidiary (a non-party). *See id.*, at ¶¶ 99–100.

Claims involving pricing and sales information

Plaintiff avers that Defendants’ website marketed the first row of colored shirts as the “Cheapest Priced Shirts” with an advertised price; however, only the white option of shirt could be purchased at that advertised price and the colored options are more expensive. *See id.*, at ¶¶ 25–30. Moreover, Plaintiff alleges that Defendants’ promoted “savings” are not mathematically correct after you click on a shirt because the crossed off price is never charged by Defendants. *See id.*, at ¶¶ 32–36. Plaintiff claims that these acts are widespread throughout Defendants’ website and that these misrepresentations are knowingly made and are harmful to consumers, the entire retail apparel industry, and Plaintiff’s subsidiary (a non-party). *See id.*, at ¶¶ 38–47.

The Complaint further alleges that the sales and discounts that Defendants offer on their website are not legitimate and are intended to mislead others. *See id.*, at ¶¶ 74–87. More specifically, Plaintiff claims that Defendants continually run sales that are advertised to end at the end of the month; however, once the month ends the same sale starts back up. *See id.*, at ¶¶ 75–79. For example, Defendants had the identical sale that ran in June 2017 and August 2017; yet, both purported to end at the end of their respective months. *See id.*, at ¶ 78. Again, Plaintiff claims that this alleged conduct has harmed consumers, the entire retail apparel industry, and Plaintiff’s subsidiary (a non-party). *See id.*, at ¶¶ 86–87.

Subjective reviews

Plaintiff also alleges the reviews found on Defendants’ website are not legitimate, upon information and belief. *See id.*, at ¶¶ 101–02. Plaintiff alleges Defendants created fake reviews themselves to deceive consumers and misrepresent the quality of their products. *See id.*, at ¶¶ 107–08. For example, Plaintiff alleges that multiple reviews identifying the author as “Deborah” have the same title and comment of “Awesome!” *See id.*, at ¶ 103. Further, Plaintiff alleges one

shirt Defendants sell has over 17,000 reviews, but not a single one or two-star review. *See id.*, at ¶ 105. Defendants allegedly repeat this kind of conduct for various items, using many different names. *See id.*, at ¶ 106. Plaintiff alleges that since these reviews were created on or near the same date, they “appear” to be fake. *See id.*, at ¶¶ 112–18. Despite no specific reviews mentioning Plaintiff or its products, Plaintiff still claims it has been harmed by these reviews. *See id.*, at ¶ 120.

Unrelated and irrelevant allegations

Lastly, Plaintiff launches an unrelated attack on a current employee of Defendants, Jason Buchanan, involving his former employer (both of whom are non-parties in this litigation) claiming Defendants unfairly utilized a confidential list Mr. Buchanan obtained unlawfully in order to contact companies. *See id.*, at ¶¶ 13, 122–26. These allegations are immaterial to the Plaintiff’s claims and should be stricken.

II. ARGUMENT

A. Legal Standard

A motion to dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6) tests the sufficiency of the complaint. *Arndt v. Johnson & Johnson*, 67 F. Supp. 3d 673, 676 (E.D. Pa. 2014). While Federal Rule of Civil Procedure 8 requires only a short and plain statement of the claim showing that the pleader is entitled to relief which gives the defendant “fair notice of what the claim is and the grounds upon which it rests,” the plaintiff must plead “more than labels and conclusions, and a formulaic recitation of the elements of a cause of action will not do.” *Id.*, at 677 (citing *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)). In order to survive a motion to dismiss under Rule 12(b)(6), the plaintiff must have pled “factual content that allows the court to draw the reasonable inference that the defendant is liable for the misconduct alleged.” *Id.*

(citing *Ashcroft v. Iqbal*, 556 U.S. 662, 678 (2009)). The factual allegations must be “enough to raise a right to relief above the speculative level.” *Id.* (citing *Twombly*, 550 U.S. at 555). Stated in another way, the plaintiff must demonstrate the entitlement to relief through the facts, not merely allege the entitlement. *See Fowler v. UPMC Shadyside*, 578 F.3d 203, 211 (3d Cir. 2009).

The court must only consider the facts alleged in the complaint and the attachments to the complaint when deciding a Rule 12(b)(6) motion to dismiss. *Id.* Additionally, the court must accept all well-pleaded allegations in the complaint, and all reasonable inferences that may be drawn from those allegations, as true and in the light most favorable to the non-moving party. *Id.* However, unsupported conclusions, unwarranted inferences, bald assertions and legal conclusions do not need to be accepted as true by the court. *Id.*

To analyze the sufficiency of a complaint under this standard, a court should: “(1) identify the elements of the claim(s); (2) review the complaint to strike conclusory allegations; and the[n], (3) consider [] the well-ple[d] components of the complaint and evaluate whether all elements previously identified are sufficiently alleged.” *Mifflinburg Tel., Inc. v. Criswell*, 80 F. Supp. 3d 566, 569 (M.D. Pa. 2015) (citing *Malleus v. George*, 641 F.3d 560, 563 (3d Cir. 2011)).

B. Plaintiff Lacks Statutory Standing Under the Lanham Act

While similar, the standard for statutory standing to bring Lanham Act claims are above those necessary for Article III standing. The issue of Lanham Act standing is reviewed in accordance with Rule 12(b)(6). *See e.g., Marathon Petroleum Corp. v. Sec’y of Fin. for Del.*, 876 F.3d 481, 493 (3d Cir. 2017). “To invoke the Lanham Act’s cause of action for false advertising, a plaintiff must plead an injury to a commercial interest in sales or business reputation proximately caused by the defendant’s misrepresentations.” *Lexmark Int’l Inc. v. Static Control Components, Inc.*, 134 S. Ct. 1377, 1395 (2014). Thus, there are two elements to statutory

standing: (1) to come within the “zone of interests” protected by the Lanham Act, a plaintiff must plead facts sufficient to establish an injury to a commercial interest in reputation or sales, and (2) that injury must be proximately caused or have a “sufficiently close connection to the conduct the [Lanham] Act prohibits.” *Id.*, at 1390; *see also id.*, at 1391 (“a plaintiff suing under § 1125(a) ordinarily must show economic or reputational injury flowing directly from the deception wrought by the defendant’s advertising.”). While the plain language of the statute permits “any person who believes that he or she is likely to be damaged” to bring suit, the Supreme Court has refused to construe this language that broadly, and instead, plaintiffs must more specifically establish their claim. *See id.*, at 1388.

This Court in *Frompovicz v. Niagara Bottling, LLC*, determined that a “paucity of allegations connecting ... lost sales with [] Defendants’ actions” warranted dismissal of plaintiff’s Lanham Act claims. 313 F. Supp. 3d 603, 615 (E.D. Pa. 2018). While that Court recognized indirect injuries may be alleged, more specific allegations are needed to plead a plausible claim. *See id.*, at 613–14. Moreover, in *Pulse Health LLC v. Akers Biosciences, Inc.*, the Court granted with prejudice defendant’s motion to dismiss the false advertising claim under *Lexmark* because “Plaintiff fails to allege any injury to commercial interest in reputation or sales.” 2017 WL 1371272, at *6 (April 14, 2017 D. Oregon). The Court indicated that an allegation that a defendant “deceptively marketed a product to consumers” is not enough. *Id.* The Court rejected plaintiff’s argument that standing can be found based on “potential injury to future commercial activity because any such injury in this case is purely speculative.” *Id.* at *7.

By way of another example, in *Millennium Access Control Tech., Inc. v. On the Gate LLC*, ruling on a motion to dismiss relating to alleged violations of 15 U.S.C. §§ 1125(a)(1)(A) and 1125(a)(1)(B), the Court found that the complaint was “bereft of any factual allegations from

which it may be reasonably inferred that [plaintiff] suffered any economic or reputational injury flowing directly from any of the purported misrepresentations in [defendant's] sales brochure or website.” No. 15-CV-6067(SJF)(AKT), 2017 WL 10445800, at *11 (E.D.N.Y. Feb. 14, 2017).

The Court, in analyzing the false advertising claim, stated that “[p]laintiff’s conclusory allegation that [a]s a direct and proximate cause of Defendants unlawful acts, [it] has suffered, and is suffering, and will continue to suffer damage to its business, reputation and goodwill, including as related to its Trademarks, and the loss of sales and profits which would be derived but for Defendant’s acts,” lacked specificity and was insufficient to state a plausible claim for relief. *Id.*, at *9–10 (internal quotations omitted). Additionally, the Court found that “[p]laintiff’s conclusory allegation that defendants’ alleged use of the marks creat[ed] confusion in the market place” were insufficient to state a plausible claim under the Lanham Act. *Id.*, at *13.

Similarly here, Plaintiff’s Amended Complaint is devoid of any factual allegations that would allow this Court to reasonably infer that Plaintiff suffered any economic or reputational injury flowing directly from Defendants’ alleged misrepresentations. Throughout Plaintiff’s Amended Complaint, Plaintiff attempts, but ultimately fails, to establish standing through a showing of proximate cause. *See* Am. Compl., ¶¶ 12, 46–47, 61–62, 72–73, 86–87, 99–100, 120, 149–50. These sections, which are the only sections in Plaintiff’s Amended Complaint that relate to proximate cause, amount to nothing more than conclusory allegations that are akin to the allegations dismissed in *Millennium*. 2017 WL 10445800, at *11; *see also Maine Springs, LLC v. Nestlé Waters N. Am., Inc.*, No. 2:14-CV-00321-GZS, 2015 WL 1241571, at *5 (D. Me. Mar. 18, 2015) (“bald and conclusory assertion alone is insufficient to state an injury.”). Plaintiff does not allege lost sales, damage to the goodwill of its brand, or that Defendants’ advertising claims call out, refer to, or impact Plaintiff in any way.

Further, Plaintiff repeats the speculative claims that “[d]efendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole,” and “[d]efendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.” *See* Am. Compl., ¶¶ 46–47, 61–62, 72–73, 86–87, 99–100. These allegations fail to articulate *any* facts that would support a reasonable inference that Plaintiff suffered any economic or reputation injury flowing from any of Defendants’ conduct. As stated by the Supreme Court in *Lexmark*, “a plaintiff cannot obtain relief without evidence of injury proximately caused by [the defendant’s] alleged misrepresentations.” 134 S. Ct. at 1395. Neither of these allegations even involve Plaintiff. Quite the opposite is true, these allegations involve speculative injuries to “consumers,” “the retail industry as a whole,” and a non-party (“TDR”). *See* Am. Compl., ¶¶ 46–47, 61–62, 72–73, 86–87, 99–100. Plaintiff plainly does not allege any facts of harm it has suffered flowing from Defendants’ alleged conduct.

Consequently, Plaintiff has failed to sufficiently plead facts that establish statutory standing under the Lanham Act, and therefore, Plaintiff’s claims should be dismissed in their entirety for lack of statutory standing pursuant to Rule 12(b)(6).⁶

⁶ If Plaintiff’s Lanham Act claims fail, then so too should Plaintiff’s Pennsylvania unfair competition claim because “the elements are parallel absent the requirement for goods to travel in interstate commerce.” *Rosenbaum & Assocs., P.C. v. Morgan & Morgan*, No. CV 17-4250, 2018 WL 1768050, at *3 fn. 40 (E.D. Pa. Apr. 12, 2018) (internal quotations and citations omitted); *see also Reese v. Pook & Pook, LLC.*, 158 F. Supp. 3d 271, 288 (E.D. Pa. 2016) (dismissing Pennsylvania unfair competition claim because Lanham Act claim failed); Am. Compl., ¶ 158.

C. The Claims Pled by Plaintiff Fail to State a Claim Upon Which Relief Could Be Granted

1. Plaintiff's Count I under Section 43(a)(1)(B) cannot survive as pled

a. Plaintiff has not pled facts to support materiality and deception sufficient to sustain a valid claim for false and deceptive advertising

In addition to Plaintiff's lack of statutory standing under the Lanham Act, based on Plaintiff's allegations, there are insufficient allegations of harm which warrants this claim's dismissal.

To prove a claim for false advertising under the Lanham Act, a plaintiff must establish five elements:

1) that the defendant has made false or misleading statements as to his own product [or another's]; 2) that there is actual deception or at least a tendency to deceive a substantial portion of the intended audience; 3) that the deception is material in that it is likely to influence purchasing decisions; 4) that the advertised goods traveled in interstate commerce; and 5) that there is a likelihood of injury to the plaintiff in terms of declining sales, loss of good will, etc.

Groupe SEB USA, Inc. v. Euro-Pro Operating LLC, 774 F.3d 192, 198 (3d Cir. 2014) (citations omitted). "The focus of the Lanham Act is on commercial interests [that] have been harmed by a competitor's false advertising." *IQ Prod. Co. v. Pennzoil Prod. Co.*, 305 F.3d 368, 375 (5th Cir. 2002) (citation omitted). In *IQ*, the Fifth Circuit affirmed the district court's decision to grant summary judgment because the plaintiff "did not establish any actual deception or materiality as to any of the contested statements." *Id.*, at 375–76.

In *Reese v. Pook & Pook, LLC*, this Court dismissed a false advertising claim where the allegations were implausible and plaintiffs failed to allege a direct injury from the statements. 158 F. Supp. 3d 271, 287 (E.D. Pa. 2016). Likewise, Plaintiff here has merely claimed a hypothetical injury based on pure speculation, relying on bald, conclusory allegations for

support.⁷ **First**, the inferences required to be assumed are not plausible in this case. For example, in order to believe Plaintiff's arguments, one must assume that a consumer lacks reasonableness when making purchasing decisions, or if unhappy after a purchase, cannot return their purchase and order from a different company.

Second, at no point in the Amended Complaint does Plaintiff allege it was harmed or will be harmed in any specific way by Defendants' alleged conduct. By way of example, Plaintiff repeats the bald, conclusory allegations that: "Defendants' conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole," and "Further, Defendants' conduct is harmful to other companies in the apparel retail industry including Printfly's recently acquired subsidiary TDR." *See* Am. Compl., ¶¶ 46–47, 61–62, 72–73, 86–87, and 99–100. As pled, these speculative injuries belong to non-parties, not Plaintiff. Moreover, while Plaintiff generally complains of alleged misleading pricing and sales conduct by Defendants, Plaintiff has failed to allege facts supporting these conclusory allegations of materiality and deception. *See id.*, at ¶¶ 129–135, 144–150, 159–167. Even more incredulous is Plaintiff's assertion that some of the alleged unlawful activity dates back to 2016; yet, Plaintiff has not alleged *any* loss of sales or consumers as a result of this alleged conduct that has been ongoing for years. *See* Am. Compl., ¶¶ 135, 150 and 166. Plaintiff fails to allege these facts likely due to factual impossibility.

Therefore, Plaintiff's Count I under Section 43(a)(1)(B) should be dismissed

⁷ While Plaintiff makes conclusory allegations, under *Iqbal* and *Twombly*, a plaintiff cannot use a barebones pleading. Instead, a plaintiff is required to plead adequate "factual content" that allows "the court to draw the reasonable inference" that the elements for a cause of action can be met. *Ashcroft v. Iqbal*, 556 U.S. 662, 678, 129 S. Ct. 1937, 1949, 173 L. Ed. 2d 868 (2009).

b. The general claims of superiority on Defendants’ website amount to mere “puffery” and do not rise to the level of false and deceptive advertising under the Lanham Act

Plaintiff alleges that Defendants’ general claims of superiority about its goods and services are misleading. *See* Am. Compl., ¶¶ 10, 48, 49–50, 52–53, 58–59, 63, 66–69, 129, and 159. However, these general claims of superiority amount to nothing more than puffery.

Under the Lanham Act, to prove a claim for false and deceptive advertising a plaintiff must show that the statement is either: (1) literally false or (2) literally true or ambiguous, but misleading to consumers. *Santana Prod., Inc. v. Bobrick Washroom Equip., Inc.*, 401 F.3d 123, 136 (3d Cir. 2005) (citing *Novartis Consumer Health, Inc. v. Johnson & Johnson-Merck Consumer Pharm. Co.*, 290 F.3d 578, 586 (3d Cir. 2002)). The question then becomes “whether the challenged statement is one of fact—actionable under [S]ection 43(a)—or one of general opinion—not actionable under [S]ection 43(a).” *Universal Elec. Corp. v. Baldwin*, No. 2:17-CV-00842, 2018 WL 3707423, at *7 (W.D. Pa. Aug. 3, 2018) (quoting *Pizza Hut, Inc. v. Papa John’s Int’l, Inc.*, 227 F.3d 489, 495-96 (5th Cir. 2000)).

“Puffery” is not actionable under the Lanham Act. *Castrol, Inc. v. Pennzoil Co.*, 987 F.2d 939, 945 (3d Cir. 1993). The Third Circuit has defined puffery as an “exaggeration or overstatement expressed in broad, vague and commendatory language.” *Id.* “The ‘puffing’ rule amounts to a seller’s privilege to lie his head off, so long as he says nothing specific.” *Id.* (quoting W. Page Keeton, et al., *Prosser and Keeton on the Law of Torts* § 109, at 756-57 (5th ed. 1984)). As such, puffery is “distinguishable from misdescriptions or false representations of specific characteristics of a product” and “is not actionable.” *Castrol*, 987 F.2d at 945.

Here, Plaintiff takes issue with several general claims of superiority made on Defendants’ website such as: “cheapest prices,” “fastest delivery,” “Best Quality T-Shirts,” “Softest Cotton,”

“Most Fashionable,” “Best Men’s Performance Products,” “Best Women’s Performance Products,” and “Best Women’s Sweatshirts.” *See* Am. Compl., ¶¶ 10, 48, 49–50, 52–53, 58–59, 63, 66–69, 129, 159. However, this type of language is just an “exaggeration or overstatement expressed in broad, vague and commendatory language.” *Castrol*, 987 F.2d at 945; *Fusco v. Uber Techs., Inc.*, No. CV 17-00036, 2018 WL 3618232, at *6 (E.D. Pa. July 27, 2018) (puffery includes general words of superiority such as: “good,” “superb,” “top-notch,” “the best,” “perfect,” and “magnificent”) (citations omitted); *see also U.S. ex rel. Knisely v. Cintas Corp.*, 298 F.R.D. 229, 243 (E.D. Pa. 2014). In *Knisely*, this Court refused to dismiss as puffery defendant’s representation that they shred documents “by pierce [and] tear method to meet the highest (DIN Level 6) security standards.” *Knisely*, 298 F.R.D. at 243. The Court reasoned that since the representation was one that is both specific and measurable, it cannot be considered mere puffery. *Id.* However, had the representation merely claimed to be the “highest security standard,” it would have been deemed puffery as a “general claim of superiority.” *Id.* Following the reasoning in *Knisely*, all of Defendants’ representations listed herein should be considered puffery as they are general claims of superiority, and are not specific or measurable.

In addition, the Tenth Circuit affirmed a motion to dismiss false advertising claims involving advertising statements concerning “best practices” and “high-quality care” on the basis that the statements were “classic puffery.” *Intermountain Stroke Center, Inc. v. Intermountain Health Care, Inc.*, 638 Fed.Appx. 778, 789 (10th Cir. 2016). The Court found the statements to be “general advertising declarations.” *Id.* at 787. Looking at the context, the Court found that since these statements were made in the healthcare industry, a customer could not reasonably be expected to believe the statements expressed actual superiority “without at least some modicum of specificity being provided.” *Id.*

These statements on Defendants’ website are highly subjective and commonly made by companies about their own products, further supporting they are protected as are puffery. *See In re Toshiba Am. HD DVD Mktg. and Sales Practices Litig.*, 2009 WL 2940081, at *9 (D.N.J. Sept. 11, 2009). In *Toshiba*, the court analyzed whether indicating “HD DVD offered the best of high-definition television and DVD” was an actionable statement or puffery. *Id.* Holding that the statement was simply puffery, the court noted: “[w]hether something is the best is highly subjective, is almost always a matter of opinion, and is the type of statement regularly made by companies in promoting their products.” *Id.* (internal quotations omitted). Likewise, the statements complained of here are exactly the kind of statements that a reasonable buyer would not rely upon because they are commonly made—especially about an ordinary product such as t-shirts. *See Castrol Inc.*, 987 F.2d at 945 (explaining statements normally discounted by a buyer are puffery).

By way of another example, Defendants’ alleged use of the term “fastest” is too generalized to be actionable and more specific language than Defendants’ has been deemed as puffery. *See Jackson Hewitt, Inc. v. H & R Block, Inc.*, No. 94-106 (E.D. Va. Jan. 31, 1994) (Norfolk Division). In *Jackson Hewitt*, the court determined that the use of “Nothing’s Faster, Nothing’s Easier” was puffery and not actionable. *Id.* If a statement such as the one in *Jackson Hewitt* is considered puffery, surely Defendants’ claim of “fastest” should be too. *See Imagine Medispa, LLC v. Transformations, Inc.*, No. 2:13-26923, 2014 WL 770810, at *5 (S.D.W. Va. Feb. 26, 2014) (holding that “West Virginia’s Lowest Price Weight Loss and Skin Care Clinic” and “Lowest Prices in WV!” are puffery – broad and vague exaggerations or boasts on which no reasonable consumer would rely); *see also Procter & Gamble Co. v. Kimberly-Clark Corp.*, 569 F. Supp. 2d 796, 799 (E.D. Wisc. 2008) (“when an advertiser claims his store has the ‘lowest’

prices or his price is the ‘best,’ no one expects that consumers will take his claims at face-value: there is, for such claim, no reliance.”); *Fink v. Time Warner Cable*, 810 F. Supp. 2d 633, 643–44 (S.D.N.Y. 2011) (holding that “fastest, easiest way to get online” is puffery and that terms like “blazing fast” and “the fastest, easiest” are classic examples of generalized puffery.”); *Pizza Hut, Inc. v. Papa John Intern., Inc.*, 227 F.3d 489, 498 (5th Cir. 2000) (holding that Papa John’s slogan “Better Ingredients. Better Pizza,” is nonactionable puffery); *Cook, Perkiss and Liehe, Inc. v. N.Cal. Collection Serv. Inc.*, 911 F.2d 242, 246 (9th Cir. 1990) (agreeing with the district court that advertisements regarding lower cost and superiority were puffery and thus nonactionable); *Am. Italian Pasta Co. v. New World Pasta Co.*, 371 F.3d 387, 391 (8th Cir. 2004) (“‘America’s Favorite Pasta’ is no a specific, measurable claim and cannot be reasonably interpreted as an objective fact. ‘Well liked’ and ‘admired’ are entirely subjective and vague. Neither provide an empirical benchmark by which the claim can be measured.”); *EP Henry Corp. v. Cambridge Pavers, Inc.*, 383 F.Supp.3d 343, 350 (D.N.J. 2019) (finding that statements such as: “[u]nrivaled beauty,” “Durafacing. A STEP ABOVE THE REST!” “EP Henry Authorized Hardscaping Distributors are the BEST,” “EP Henry [has] the BEST products,” “Nothing surpasses EP Henry Pavers with Durafacing technology,” are nonactionable puffery.).

Thus, the alleged misrepresentations amount to nothing more than non-actionable puffery; and therefore, Plaintiff cannot establish a claim under the Lanham Act based on them.

c. The reviews on Defendants’ website are non-actionable under the Lanham Act

Lastly, Plaintiff alleges that Defendants fabricate reviews on their website. This allegation is immaterial because the reviews are non-actionable pursuant to the Lanham Act.

First, it has been recognized that a reasonable reader would comprehend that a review on a website merely expresses an opinion. *See Davis v. Arvo, Inc.*, 345 F. Supp. 3d 534, 543

(S.D.N.Y. 2018); *see also Nunes v. Rushton*, 299 F. Supp. 3d 1216, 1239 (D. Utah 2018) (reviews that are a “matter of opinion and cannot be proven true or false” are not actionable). In *Davis*, the court concluded that purposely posting only positive reviews are not false or misleading statements because the reviews are subjective. *Id.* Moreover, this Court has determined that a review which “did not propose any form of commercial transaction nor [did] it embody the typical characteristics of an advertisement” is also not actionable under the Lanham Act. *GOLO, LLC v. HighYa, LLC*, 310 F. Supp. 3d 499, 505 (E.D. Pa. 2018). In *GOLO*, this Court noted that defendant’s reviews “do not promote any competing product, [] do not explicitly propose a commercial transaction” and “do not go so far as to make any specific recommendations to consumers.” *Id.*, at 504. This Court found persuasive the Eleventh Circuit’s analysis of reviews, and found that any “financial benefit is merely incidental.” *See id.*, at 505.

Second, even employee-produced reviews have been deemed as non-actionable puffery. In *Jive Commerce, LLC v. Wine Racks America, Inc.*, the Court held that employee-produced reviews posted on the internet about their own company were puffery and therefore not actionable under the Lanham Act. No. 1-18-CV-49 TS-BCW, 2018 WL 3873675, at *2 (D. Utah Aug. 15, 2018). The reviews posted by the employee in *Jive Commerce* stated that the defendant was a “great company” that provides “great wine racks” and “top quality products,” but the court still found that these statements constituted sales puffery and were not actionable under the Lanham Act. *Id.*

Here, Plaintiff takes issue with a number of comments left on Defendant Jiffy’s Blank Website. For example, Plaintiff claims reviews left by a “Deborah” that state “Awesome!” with the same title must be fake. *See Am. Compl.*, ¶¶ 103–104. Second, Plaintiff alleges that “despite

seventeen thousand (17,000) reviews for the Gildan G500, there is not a single one-star or two-star review. *Id.*, at ¶ 105. No matter how you look at it, the reviews do not support Plaintiff's claims. The reviews are entirely subjective comments which cannot be proven true or false (i.e. "Awesome!"). Further, assuming *arguendo* that the reviews are fabricated—which Defendants deny—and are not confined to subjective opinions, the reviews are non-actionable puffery. The reviews on Defendants' website are less detailed than the reviews addressed in *Jive Commerce, LLC*, and just as that court found that the statements were non-actionable puffery, so too should this Court.

As such, the reviews complained of in Plaintiff's Amended Complaint are non-actionable under the Lanham Act.

2. Plaintiff's Count II under Section 43(a)(1)(A) should be dismissed because Plaintiff failed to allege any basic elements required

Although Plaintiff labels Count II as a "false and deceptive advertising" claim (*see* Am. Compl., at p. 21), this section of the Lanham Act is meant for "false designation of origin" claims. *See Parks LLC v. Tyson Foods, Inc.*, 863 F.3d 220, 226 (3rd Cir. 2017). Plaintiff has failed to plead (1) ownership of a protectable trademark, and (2) a likelihood of confusion from Defendants' use of their own mark, as required for a false designation of origin count. This Court should dismiss Count II.

The Supreme Court noted in *Lexmark* that Section 43(a) "creates two distinct bases of liability: false association, §1125(a)(1)(A), and false advertising, §1125(a)(1)(B)." 572 U.S. 118, 122; *see also*, McCarthy on Trademarks 27:9. The Third Circuit addressed the difference between the two sections in *Parks LLC v. Tyson Foods, Inc.*, 863 F.3d 220 (3rd Cir. 2017). The Court noted that §1125(a)(1)(A) is for claims of "false designation of origin" or "false association" and §1125(a)(1)(B) is for false advertising. *Parks LLC*, 863 F.3d at 226. The Court

held that the plaintiff’s “false advertising claim fails because it is essentially a false association claim in disguise.” *Id.* The elements for a 43(a)(1)(A) claim were discussed, and the distinction also addressed in *King of Prussia Dental Assoc., Ltd. v. King of Prussia Dental Care, LLC*, 2019 WL 2240492, at *9 (May 23, 2019, E.D. Pa.):

Here, Plaintiff brings a false designation of origin claim—that is, it argues that Defendant’s use of the service mark KOP Dental Care is likely to cause confusion about the origin of its services. (Doc. Nos. 1, 2, 12.) To establish a false designation of origin claim under Section 43(a) of the Lanham Act, a plaintiff must show that (1) it owns a valid and legally protectable service mark, and (2) “the defendant’s use of the mark to identify goods or services causes a likelihood of confusion.” *Alliance Bank*, 742 F. Supp. 2d at 545 (quoting *A & H Sportswear, Inc. v. Victoria’s Secret Stores, Inc.*, 237 F.3d 198, 210 (3d Cir. 2000)).

Here, Plaintiff has failed to plead *any* facts to support either element of a cognizable claim for false designation of origin under the Lanham Act. Notably, in *Key Recycling LLC v. Appliance Recycling Centers*, this Court swiftly dismissed a 43(a)(1)(A) false designation of origin claim where “[t]he Complaint contains no allegations that Defendant attempted to pass off its services under Plaintiff’s name or mark.” 2018 WL 4615856, at *5 (September 25, 2018 E.D. Pa). This Court should reach the same result, and dismiss Plaintiff’s Count II for failure to state a claim.

3. For the same reasons Plaintiff’s Lanham Act claims should be dismissed for failure to state a claim, so too should Plaintiff’s Pennsylvania unfair competition law claim

Plaintiff’s Lanham Act claims and Pennsylvania unfair competition claims can be analyzed together because “the elements are parallel absent the requirement for goods to travel in interstate commerce.” *Rosenbaum & Assocs., P.C. v. Morgan & Morgan*, No. CV 17-4250, 2018 WL 1768050, at *3 fn. 40 (E.D. Pa. Apr. 12, 2018) (internal quotations and citations omitted); *see also Reese v. Pook & Pook, LLC*, 158 F. Supp. 3d 271, 288 (E.D. Pa. 2016) (dismissing Pennsylvania unfair competition claim because Lanham Act claim failed); Am. Compl., ¶ 158.

Thus, Count III should be dismissed by this Court for failure to state a claim for the same reasons as Counts I and II.

D. Motion to Strike Immaterial, Impertinent, and Scandalous Matter from Plaintiff's Amended Complaint Pursuant to Fed.R.Civ.P. 12(f)

Alternatively, should this Court not dismiss Plaintiff's Amended Complaint in its entirety, then ¶¶ 13, 122–126 should be stricken because they do not contain relevant information for purposes of this case and are immaterial, impertinent, and scandalous. These allegations relate to one of Defendants' employees providing Defendants with alleged confidential information, specifically a proprietary and confidential list of decorators which this employee obtained from his previous employer, Alpha. These allegations were “thrown” in the Complaint for no reason, have nothing to do with the claims here and were inserted in the Complaint to interfere with Defendants' relationship with one of its suppliers, Alpha.

Insofar as motions to strike are concerned, Fed.R.Civ.P. 12(f) permits the court, on its own motion or on the timely motion of a party, to strike from any pleading any redundant, immaterial, impertinent, or scandalous matter. *Tennis v. Ford Motor Co.*, 730 F.Supp.2d 437, 443 (W.D.Pa. 2010) (citing *Adams v. Cnty. of Erie, Pa.*, 2009 WL 4016636 at *1 (W.D.Pa. Nov. 19, 2009)).

This Court has properly explained that standard of review on a motion to strike as follows:

Content is immaterial when it “has no essential or important relationship to the claim for relief.” *Donnelly v. Commw. Fin. Sys.*, No. 07-1881, 2008 WL 762085, at *4 (M.D. Pa. March 20, 2008), citing *Del. Health Care, Inc. v. MCD Holding Co.*, 893 F.Supp. 1279, 1291–92 (D. Del. 1995). Content is impertinent when it does not pertain to the issues raised in the complaint. *Id.*, citing *Cech v. Crescent Hills Coal Co.*, No. 96-2185, 2002 WL 31002883, at *28 (W.D. Pa. July 25, 2002). Scandalous material “improperly casts a derogatory light on someone, most typically on a party to the action.” *Id.*, citing *Carone v. Whalen*, 121 F.R.D. 231, 233 (M.D. Pa. 1988).

“The standard for striking a complaint or a portion of it is strict, and ‘only allegations that are so unrelated to the plaintiffs' claims as to be unworthy of any consideration should be stricken.’ ” *Steak Umm Co., LLC v. Steak 'Em Up, Inc.*, No.

09-2857, 2009 WL 3540786, at *2 (E.D. Pa. Oct. 29, 2009), citing *Johnson v. Anhorn*, 334 F.Supp.2d 802, 809 (E.D. Pa. 2004). “The purpose of a motion to strike is to clean up the pleadings, streamline litigation, and avoid unnecessary forays into immaterial matters.” *McInerney v. Moyer Lumber and Hardware, Inc.*, 244 F.Supp.2d 393, 402 (E.D. Pa. 2002).

Giuliani v. Polysciences, Inc., 275 F. Supp. 3d 564, 572 (E.D. Pa. 2017).

In its Amended Complaint, Plaintiff claims that Defendants have unlawfully used a proprietary and confidential contact list that Defendants’ current employee, Jason Buchanan, obtained from his former employer (both non-parties to this litigation). *See* Am. Compl., at ¶¶ 13, 122–26. These allegations hold no value in this case, are entirely irrelevant to Plaintiff’s false advertising claims, and would likely result in confusion about the issues. Allegations of theft of a contact list are wholly insufficient to establish a valid cause of action for false advertising (Count I), false designation of origin (Count II), or Pennsylvania Unfair Competition (Count III). In fact, Plaintiff specifically points to conduct which it believes are actionable in each Count; however, make no mention of the alleged conduct within ¶¶ 13, 122–26 as a basis for any of its claims. *See* Am. Compl., at ¶¶ 129, 144, and 159. The allegations are irrelevant. Moreover, Plaintiff has no right to use these allegations as a basis for its own claims, since the alleged conduct involves an employee of Defendants and a third-party company—neither of which are parties to this action.

Moreover, these allegations accusing Mr. Buchanan of unlawfully obtaining a confidential list from his former employer are highly disparaging to Mr. Buchanan’s reputation and are therefore scandalous and derogatory. Allowing these allegations to stand offers no probative value to Plaintiff’s case, will complicate the litigation by adding Mr. Buchanan and his former employer as subjects of discovery and potential witnesses. Finally, these allegations have nothing to do with the federal cause of action that is the basis for either this Court’s subject

matter jurisdiction, or the case and controversy between Plaintiff and Defendants, and should not remain part of this case.

Thus, the allegations in ¶¶ 13, 122–26 should be stricken in their entirety should this Court determine Plaintiff’s Amended Complaint should not be dismissed in its entirety.

III. CONCLUSION

For the reasons stated above, Defendants respectfully requests that this Court dismiss with prejudice Counts I, II and III of Plaintiff’s Amended Complaint.

Respectfully submitted,

Dated: February 18, 2020

/s/ Larry M. Keller
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EXHIBIT 1

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Attorney for Plaintiffs

PRINTFLY CORPORATION

d/b/a RushOrderTees.com

2727 Commerce Way
 Philadelphia, PA 19154

Plaintiff

v.

DEKEO INC.

1000 N. West Street, Suite 1934
 Wilmington, DE 19801

And

JIFFYSHIRTS.COM US, LP.

1000 N. West Street, Suite 1934
 Wilmington, DE 19801

Defendant

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY,
 PENNSYLVANIA

No. 190509004

COMMERCE PROGRAM

NON-JURY

NOTICE

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you. YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER OR CANNOT AFFORD ONE, GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

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 Courthouse - Second Floor
 High & Allegheny Streets
 Bellefont, PA 16823
 Telephone: (814) 355-6727

AVISO

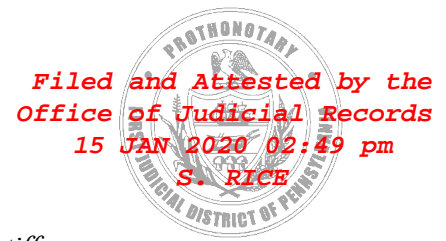
Le han demandado a usted en la corte. Si usted quiere defenderse de estas demandas expuestas en las paginas siguientes, usted tiene veinte (20) dias de plazo al partir de la fecha de la demanda y la notificacion. Hace falta asentar una comparecencia escrita o en persona o con un abogado y entregar a la corte en forma escrita sus defensas o sus objeciones a las demandas en contra de su persona. Sea avisado que si usted no se defiende, la corte tomara medidas y puede continuar la demanda en contra suya sin previo aviso o notificacion. Ademas, la corte puede decidir a favor del demandante y requerir que usted cumpla con todas las provisiones de esta demanda. Usted puede perder dinero o sus propiedades u otros derechos importantes para usted.

LLEVE ESTA DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

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Attorney for Plaintiff

PRINTFLY CORPORATION

d/b/a RushOrderTees.com

2727 Commerce Way
Philadelphia, PA 19154

Plaintiff

v.

DEKEO INC.

1000 N. West Street, Suite 1934
Wilmington, DE 19801

And

JIFFYSHIRTS.COM US, L.P.

1000 N. West Street, Suite 1934
Wilmington, DE 19801

Defendants

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY,
PENNSYLVANIA

No. 190509004

COMMERCE PROGRAM

NON-JURY

AMENDED COMPLAINT

AND NOW, Comes, Plaintiff, Printfly Corporation d/b/a RushOrderTees.com (“Printfly” or “Plaintiff”), by and through undersigned counsel, Bochetto & Lentz, P.C., and hereby states as follows in support of this Amended Complaint against Defendants, Dekeo Inc. (“Dekeo”) and Jiffyshirts.com US, L.P. (“Jiffy”) (collectively “Defendants”):

THE PARTIES

1. Plaintiff, Printfly Corporation d/b/a RushOrderTees.com (“Printfly”) is a Pennsylvania corporation headquartered in Philadelphia that may be served at 2727 Commerce Way, Philadelphia, PA 19154.

2. Defendant, Dekeo Inc. (“Dekeo”) is, upon information and belief a Delaware corporation with a listed business address of 1000 N. West Street, Suite 1934, Wilmington, DE 19801.

3. Defendant, Jiffyshirts.com US, L.P. (“Jiffy”) is, upon information and belief a Delaware corporation with a listed business address of 1000 N. West Street, Suite 1934, Wilmington, DE 19801.

4. At all times material hereto, Dekeo and/or Jiffy operated two websites, www.jiffyshirts.com and www.dekeo.com. However, after Plaintiff filed their original complaint, Defendants removed www.dekeo.com and relocated it to www.jiffyshirts.com/print. Because it is unclear which entity operates which website(s), unless referred to specifically or individually, Defendants are collectively referred to hereinafter as “Defendants” or “Jiffy.”

5. Jiffy operates a website called JiffyShirts.com which regularly sells and ships blank apparel (“Blank Apparel Business”) to Philadelphia County.

6. On May 17, 2019, Jiffy sold and shipped its products to Philadelphia, Pennsylvania for pecuniary gain. (See Purchase and Shipping information for an order Defendant mailed to Philadelphia County attached hereto as **Exhibit “A”**).

7. Jiffy regularly conducts business in Philadelphia County, transacts business in Philadelphia County, and is subject to the jurisdiction of Pennsylvania’s courts.

8. Jiffy also operates a website called Dekeo.com (recently relocated to jiffyshirts.com/print) which purports to be a marketplace of companies that design, print and embroider on apparel (“Decorated Apparel Business”).

SUMMARY OF THE CASE

9. In early 2019, a dispute arose between Printfly and Jiffy about unrelated matters wherein Jiffy alleged that Printfly was its competitor. In response to that dispute, Printfly reviewed Jiffy’s websites and determined that, dating back to at least 2017, Jiffy was making countless inaccurate, misleading and knowingly false representations to the public on their website and in their advertisements in an effort to promote sales of their products. Defendants’ conduct in this regard is in clear and blatant violation of Pennsylvania’s common law relating to unfair competition, as well as the false advertising and misleading statements of fact provisions of the Lanham Act, 15 U.S.C. §§ 1125(a)(1)(A) and 1125(a)(1)(B).

10. By way of limited example only, Defendants misrepresent that they have the “cheapest prices,” “fastest delivery,” and indicate that apparel is discounted from significantly higher prices which, upon information and belief, Defendants don’t and never have charged any consumers in the marketplace. Additionally, Defendants advertise that they have a free shipping sale expiring at the end of each month that never actually expires.

11. Further, the prices advertised by the Defendants on Google and on their website for specific products are not the actual prices when the item is selected, and require a purchaser to buy the product in a different color, in bulk, or for the purchaser’s shopping cart to exceed a certain monetary amount. In fact, unless a customer buys in bulk, the actual price of the apparel is sometimes as much as double the advertised price and the advertised discount can never be achieved for the specific product, irrespective of the quantity ordered.

12. Such conduct amounts to unfair competition and creates injury and/or a likelihood of injury to The Deal Rack (“TDR”), a business Printfly recently acquired that resells blank apparel.

13. Separately, upon information and belief, Defendants Decorated Apparel Business is soliciting decorators that compete with Printfly’s core brand RushOrderTees.com (“ROT”) from a proprietary and confidential list that was unlawfully obtained by one of Defendants’ executive level employees, Jason Buchanan (“Buchanan”) from his prior employer Alphabroder (“Alpha”) with the knowledge and permission of Defendants’ CEO, Chris Serflek (“Serflek”).

14. Further, Defendants’ Decorated Apparel Business contains countless reviews of individual decorators using industry buzzwords and words that sound similar to Plaintiff’s “rush order” business, but no method of actually leaving a review for the decorator on the website. Upon information and belief those reviews are not genuine and placed solely to confuse customers, deceive customers, are misrepresentations about quality approval of Defendants’ goods and the decorators that Defendants assembled for their website.

15. Such conduct amounts to unfair competition, a violation of the Lanham Act, and creates a likelihood of injury to Printfly’s core business ROT which engages in the customization, printing, embroidering, and other decoration of apparel.

16. Upon information and belief, Defendants are recklessly, intentionally, knowingly, and/or purposely engaging in this conduct in an effort to confuse customers as to the price and quality of their goods, to maximize profits based on misleading information, and to game their position and search results on Google.

17. Printfly seeks this Court’s intervention to compel the Defendants to remove any false advertising and misrepresentations made by the Defendants from their websites and from

their advertising, correct all such misrepresentations, disgorge any profits obtained as a result, and reimburse Printfly's costs and reasonable attorneys' fees to obtain such relief.

JURISDICTION AND VENUE

18. This Court has subject matter jurisdiction over this matter pursuant to 42 Pa. C.S.A. § 931(a) and has personal jurisdiction over Defendants pursuant to 42 Pa.C.S.A. § 5322 because Defendants sell and ship products for pecuniary gain in this Commonwealth, and Defendants direct advertisements, including the false and misleading advertisements at issue herein to Pennsylvania customers.

19. Venue is proper in the Philadelphia County Court of Common Pleas under Rules 1006 and 2179 of the Pennsylvania Rules of Civil Procedure as Printfly and TDR are located in Philadelphia County, the conduct alleged herein is directed to consumers in Philadelphia County, and Defendants regularly conduct business in Philadelphia County.

FACTS COMMON TO ALL COUNTS

20. The resale of blank apparel is viewed in the industry as a "commodity" business because, regardless of retailer, individual blank apparel products are the same throughout the industry.

21. By way of example only, irrespective of where a customer purchases the Gildan "G500" t-shirt, the product, colors, and quality will be the same. Assuming the t-shirt is genuine, a small Red G500 purchased from the Plaintiff or from the Defendants will match every other small Red G500 available for sale online in size and color.

22. As a result, a customer seeking to purchase a G500 t-shirt online will seek out the cheapest supplier and make purchase decisions based on a retailer's representations about price, shipping cost, and speed of delivery.

23. Jiffy holds itself out as a leading online reseller of blank apparel, selling approximately ten times as much product as its nearest competitor through its website www.jiffyshirts.com (Jiffy's "Blanks Website").

24. However, Jiffy's Blanks Website achieves this success by making countless misrepresentations about the price and quality of their products, creating arbitrary discounts and sale deadlines, and requiring a customer to purchase apparel in different colors and bulk quantities to actually receive the pricing they advertise.

Misrepresentations about Price

25. According to the Blanks Website homepage, the first row of t-shirts is titled the "Cheapest Priced T-Shirts." (See Blanks Website homepage attached hereto as **Exhibit "B"**).

26. Defendants advertise a yellow "Corn Silk" colored Gildan G500 for sale for \$1.62.

27. When a customer clicks on the t-shirt to purchase it, the customer is directed to a website where the yellow "Corn Silk" colored Gildan G500 costs \$2.67, almost double Defendants' advertised price. (See G500 Page attached hereto as **Exhibit "C"**).

28. In fact, in order to receive the Gildan G500 for \$1.62, the customer must select a white t-shirt—not the one that Defendants advertise on the Blanks Website homepage.

29. Irrespective of the quantity purchased, a customer is *never* able to achieve a price of \$1.62 for the Gildan G500 in yellow "Corn Silk" color, or any color other than white. See Ex. C.

30. Accordingly, the yellow "Corn Silk" colored Gildan G500 "from \$1.62" is falsely advertised by Defendants on their Blanks Website homepage.

31. Further, the G500 Page indicates that the retail price of the Gildan G500 is \$5.60 and by purchasing from the Blanks Website a customer will "SAVE 71%". See Ex. C.

32. However, upon information and belief, Defendants don't charge and never have charged \$5.60 for the Gildan G500 and therefore misrepresent the savings that they offer to customers on the Gildan G500.

33. This appears to be the case for the entire row of t-shirts Defendants advertise as their "Cheapest Priced T-Shirts" including but not limited to: the Fruit of the Loom 3931, Gildan G200, and Jerzees 29M. *See* Ex. B.

34. For each of those shirts, a different color than white is advertised.

35. However, when the shirt is actually selected, the price advertised on the Blanks Website homepage can only be achieved if a customer selects the white version of the shirt. (*See* Fruit of the Loom 3931, Gildan G200, and Jerzees 29M pages attached hereto as **Exhibit "D"**).

36. Like the G500, an arbitrarily inflated retail price is listed for each shirt, along with a savings percentage indicating that the customer is obtaining savings of approximately 70%, despite Defendants never actually charging the stated retail price, and never actually providing a customer with the advertised savings.

37. Additionally, like the G500, irrespective of bulk discount applied, the advertised price for each shirt can never be achieved unless a white version of the t-shirt is purchased by the customer.

38. Upon information and belief, this conduct is rampant throughout Defendants' Blanks Website and is not solely limited to the "Cheapest Priced T-Shirts" section of the website.

39. By way of limited example only, Plaintiff selected a Bella+Canvas 3650 t-shirt that is advertised as costing \$5.29 under the "Softest Unisex T-Shirts" category. (*See* Bella Shirts Page attached hereto as **Exhibit "E"**).

40. Despite listing the t-shirt for \$5.29, when selected, the shirt costs \$7.40 each, unless the customer purchases in excess of \$80 in product from the Blanks Website. *See* Ex. E.

41. Moreover, the retail price of the shirt is listed as \$12.18 and the customer is purportedly saving 57% by purchasing it through the website. *See* Ex. E.

42. Upon information and belief, Defendants never sold the Bella+Canvas 3650 shirt for \$12.18.

43. Further, unless a customer purchases in excess of \$80 of apparel, Defendants' "savings" math is incorrect and the savings from the \$12.18 artificially inflated retail price to the \$7.40 cost of one t-shirt is less than 40%.

44. Accordingly, Defendants make material misrepresentations of price, discount, savings, and potential savings throughout their website.

45. Upon information and belief, Defendants know that they are making misrepresentations about price, and nevertheless knowingly and purposely make misrepresentations to that effect.

46. Defendants' conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

47. Further, Defendants' conduct is harmful to other companies in the apparel retail industry including Printfly's recently acquired subsidiary TDR.

Defendants' T-Shirts are not the Cheapest Priced

48. When searching Google for "jiffyshirts" the Blank Website's description claims that "JiffyShirts.com has the lowest prices fastest delivery." (*See* Google Search Results attached hereto as **Exhibit "F"**).

49. Further, the first row of shirts on the Blanks Website states that the shirts are the “Cheapest Priced.” See Ex. B.

50. Additionally, Defendants’ paid advertisements on Google represent to the public that Defendants that their products are “Always In Stock”, that they have “The Fastest Delivery” and that they have the “Cheapest Prices” / “Lowest Prices”. (See Examples of Defendants’ Paid Google Ads attached hereto as **Exhibit “S”**).

51. Upon a cursory review of Defendants’ website it is obvious that their products are not always in stock.

52. Further, upon information and belief Defendants’ delivery is not faster than the rest of the industry and Defendants do not have any evidence that their delivery is in fact the “fastest.”

53. More importantly, Defendants don’t have the “lowest prices”, “cheapest prices”, and they are not in fact the “Cheapest Priced” when taking into account all costs that the Defendants pass on to the customer.

54. By way of example only, if a customer wants to purchase one white Gildan G500 t-shirt, the total cost is **\$8.52**, which includes the \$1.62 cost of the shirt, \$5.95 in shipping, \$0.12 in sales tax, and a \$0.83 Processing Tax Fee (that is more than 6x the actual sales tax). (See G500 Order Summary attached hereto as **Exhibit “G”**).

55. Although Printfly’s RushOrderTees.com (“ROT”) website is not a competitor of Jiffy, and is not geared towards the resale of blank apparel, it is possible to purchase a blank t-shirt through the website by not creating a design in the design studio (or skipping the design part of the process) and proceeding to check out. (See ROT Order Summary attached hereto as **Exhibit “H”**).

56. A white Gildan G500 t-shirt can be purchased for \$4.45, including tax and shipping costs from ROT—approximately half of Defendants’ price. *See* Ex. H.

57. By way of additional example only, a company that is in fact Defendants’ competitor, CheapesTees.com has the same shirt including tax and shipping costs for a total of \$5.92. (*See* CheapesTees.com screenshot attached hereto as **Exhibit “I”**).

58. To the extent that Defendants claim that their “Cheapest Priced” and “lowest prices” claims pertain solely to the cost of the shirt, exclusive of fees, shipping costs, and taxes, by way of example only, another one of Defendants’ competitors, ShirtMax.com has the same shirt prices for \$1.59, also cheaper than Jiffy. (*See* ShirtMax.com screenshot attached hereto as **Exhibit “J”**).

59. Accordingly, it is obvious that the Defendants’ products are not the “Cheapest Priced” and that Defendants don’t offer the “lowest prices” and Defendants’ claims to the contrary are misrepresentations.

60. Upon information and belief, Defendants know that their products are not the cheapest priced, and nevertheless knowingly and purposely make misrepresentations to that effect.

61. Defendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

62. Further, Defendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.

Misrepresentations about Quality

63. The second row of t-shirts is titled the “Best Quality T-Shirts.” *See* Ex. B.

64. However, there is no basis from which Defendants can claim that those four shirts are in fact the best quality.

65. In fact, one of the shirts, the Alternative AA1070 has a five-star rating, but only has one review. *See* Ex. B.

66. Moreover, the Gildan G500 t-shirt, which is listed as Defendants' "cheapest" t-shirt has the same four-and-one-half star rating as the rest of the shirts in the "Best Quality" row, but has over seventeen thousand reviews, a fraction of the reviews for the others. *See* Ex. B.

67. Accordingly, Defendants' claim that those shirts are the "Best Quality" is unsubstantiated, misleading, and a misrepresentation.

68. Instead, upon information and belief, the shirts that Defendants claim are the "Best Quality" provide an increased profit margin for the Defendants and are knowingly mislabeled to convince consumers to purchase them over cheaper versions of the same or similar quality shirts.

69. Defendants' Blanks Website has countless other such misrepresentations of quality including "Softest Cotton," "Most Fashionable," "Best Men's Performance Products," "Best Women's Performance Products," and "Best Women's Sweatshirts."

70. Upon information and belief, these labels are used specifically to increase Defendants positioning within search engines and confuse customers into purchasing what is essentially a commodity good.

71. Upon information and belief, Defendants are aware that the representations are not factually accurate, and nevertheless knowingly and purposely make the misrepresentations to deceive consumers.

72. Defendants' conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

73. Further, Defendants' conduct is harmful to other companies in the apparel retail industry including Printfly's recently acquired subsidiary TDR.

Misrepresentations about Sales and Discounts

74. According to the “Bulk Discounts” page on the Blanks Website, Defendants offer free shipping for orders \$49 and over and bulk discounts for orders over \$80. (*See* Bulk Discounts Page attached hereto as **Exhibit “K”**).

75. Defendants represent that the free shipping sale ends on September 30, 2019, at which point it reverts to free shipping only for orders over \$150. *See* Ex. K.

76. Additionally, the bulk discount has regular discount percentages crossed out in lieu of an increased discount for orders over \$250. *See* Ex. K.

77. However, upon review of two archived versions of the page it is obvious that neither the free shipping sale, nor the bulk discount sale ever expire.

78. In fact, in two pages, one from August 2017 and one from June 2017, Defendants had the exact same sales, purporting to expire at the end of August 2017 and June 2017. (*See* Archived Bulk Discounts Pages attached hereto as **Exhibit “L”**).

79. Upon information and belief Defendants’ sales never expire, Defendants never charged shipping for orders between \$60 and \$150, and never actually charged customers the bulk discounts that are crossed out on the “Bulk Discounts” page.

80. Separately, according to Defendants’ page, the bulk discounts are applied automatically.

81. However, Defendants’ discounts and discount calculations are inaccurate because countless items on their website do not actually receive the advertised discount.

82. By way of example only, for a \$1,620.00 order of 1000 Gildan G500 t-shirts in white, the customer does not receive the 22% discount or any discount, irrespective of the quantity purchased. (*See* 1000 Gildan G500 Order Summary attached hereto as **Exhibit “M”**).

83. Further, for a \$1,001.25 order of 375 Gildan G500 t-shirts in “Corn Silk” yellow, the discount is only \$191.25, or 19.1% -- instead of the advertised 21% discount. (See 375 Gildan G500 in “Corn Silk” yellow Order Summary attached hereto as **Exhibit “N”**).

84. Accordingly, Defendants’ representations about expiring sales, bulk discount rates, and automatically applied discounts are misrepresentations to the consumer.

85. Upon information and belief, Defendants’ conduct and misrepresentations are knowing, purposeful, and done for the purpose of funneling customers into products that are the most profitable for the Defendants.

86. Defendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

87. Further, Defendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.

Misrepresentations about Exclusivity

88. According to the Blanks Website’s “Contact Us” page, customers can “find the following **Only** at JiffyShirts.com!” (emphasis added):

- **Show all the product information we have.** That includes images, sizing information, descriptions, materials, material weight, and color samples.
- **Complete inventory information.** Don't worry about out-of-stock items or substitutions. We show which products are good for small or bulk orders. We won't sell what we don't have.
- **Shipping and delivery dates.** No unclear "usually ships", "shipping today" on a Sunday, or special shipping conditions. We check our warehouses and automatically ship the order to you as fast as possible at no extra charge.
- **Fastest shipping at no extra charge.** Don't pay more for Next Day shipping. We don't even have to offer this service. We use our national network of 10 warehouses to provide fast deliveries at UPS Ground rates.
- **Free or cheap shipping.** Just enter your address. We clearly show free or the cheap flat-rate shipping fee on the cart page. You do not need to create an account or give personal information first.
- **We won't change your order.** We never backorder, remove out-of-stock items and ship the rest, or substitute items. We show inventory information so you can buy what we have in stock.
- **Automatic bulk discounting.** You don't have to call and bargain hoping to get a fair price. We automatically give the maximum discount on bulk orders to all customers.
- **Tracking info emailed on the shipping day.** Don't worry about your package. We send the tracking information automatically.

- **We do not keep your credit card information.** Safer than phone or fax orders. We don't want people to see our information, why would you? Our staff never sees your complete credit card information. To protect you from hackers, we use advanced security. Once your order is complete, we delete this information from our system. For your protection, you must enter this private information for every order.
- **We respect and protect your privacy.** We never share your information. We delete all we can after shipping. We never harass you with junk email.

89. However, Defendants are clearly not the only business entity in the apparel retail space that, by way of limited example only, shows all product information, shipping and delivery dates, free or cheap shipping, won't change orders, provide tracking info on the shipping day, and respects their consumers' privacy.

90. By way of example only, Defendants claim that they are the only company that offers "complete inventory information."

91. However, in addition to not providing "complete" inventory information, and maxing out their inventory numbers at 999 (unlike many of their competitors), Defendants ignore the fact that this feature appears on most blank apparel retailers as the data is made available to all blank apparel resellers by the blank apparel suppliers.

92. Defendants make other similar "only JiffyShirts.com" claims throughout the Blanks Website. By way of additional example, Defendants claim that "only JiffyShirts.com will provide a free return shipping label for your unwanted items!" *See* Ex. K.

93. However, TDR, and many other companies in the blank apparel industry provide free return shipping label for unwanted items.

94. Additionally, despite not owning any warehouses, Defendants claim that they check "our" warehouses for shipping and delivery dates, leading consumers to believe that they have physical locations, when in fact the company does not even list a physical address on its website—only a P.O. box.

95. Defendants make this misrepresentation about owning or possessing warehouses throughout their website, when in fact these are the same warehouses that serve most of the industry. Such misrepresentations include, checking “our 3 closest warehouses ... Only at JiffyShirts.com!” and Defendants claim that they “invested in shipping quickly through our national warehouse network.” *See* Ex. K.

96. In doing so, Defendants make the false claim that their customers get “orders the fastest and cheapest with JiffyShirts.com”

97. Accordingly, Defendants’ representations about their business and exclusivity in the industry regarding common services provided by other companies in the industry, including TDR, are misrepresentations to the consumer.

98. Upon information and belief, Defendants conduct and misrepresentations are knowing, purposeful, and done for the purpose of misleading consumers into believing that certain services are available “only at JiffyShirts.com.”

99. Defendants’ conduct is likely to cause confusion to customers and to harm the retail apparel industry as a whole.

100. Further, Defendants’ conduct is harmful to other companies in the apparel retail industry including Printfly’s recently acquired subsidiary TDR.

Fake Reviews

101. Upon information and belief the reviews on Jiffy’s Blanks Website are not genuine.

102. Upon cursory review of the Gildan G500 reviews, it appears that the review pages are static, pre-created and many of the Gildan G500 reviews are from the same individuals and contain the same or substantially the text. However, those reviews appear on different days.

103. By way of example only, on page 300 of the reviews, “Deborah” left **eight** reviews, all of which have a title of “Awesome!” and a comment of “Awesome!” Those reviews occur on six separate dates from December 2016 through October 2017. (See Page 300 of the G500 reviews attached hereto as **Exhibit “T”**).

104. By way of additional example, on page 303 of the reviews, “Deborah” left **twelve** reviews, that all have a title of “Awesome” and a comment of “Awesome”. (See Page 303 of the G500 reviews attached hereto as **Exhibit “U”**).

105. Notably, despite over seventeen thousand (17,000) reviews for the Gildan G500, there is not a single one-star or two-star review.

106. Plaintiff repeated this process for various items on Defendants’ Blanks Website, navigated to the last pages of reviews, and found countless names leaving dozens of reviews with the same or substantially the same titles and comments, including but not limited to: “Ardeart” “Ulisses” “Rodanica” “Jose” “Maria” “Angela” “J” dating back to the end of 2016 / beginning of 2017.

107. Upon information and belief, Defendants knowingly and purposely created these fake reviews themselves in an effort to game and deceive search engine results with keywords relating to the product and misrepresentations about quality for their best selling and/or most profitable products.

108. Upon information and belief, such fake review practices are rampant throughout the website and have contributed to the websites success dating back to end of 2016 / beginning of 2017.

109. Jiffy operates a second website which was formerly hosted at www.dekeo.com but has been moved to www.jiffyshirts.com/print.

110. That website purports to be an online marketplace of apparel decorators (“Marketplace Website”) that perform the same tasks and services as ROT. (*See* screenshot of decorators on the Marketplace Website attached hereto as **Exhibit “O”**).

111. When Defendants were preparing to launch the Marketplace Website they contacted Printfly’s flagship website, ROT, to be one of the decorators on the website, but Printfly declined to participate.

112. When Defendants launched the website, listing more than 50 decorators, the decorators appeared to have reviews almost instantly. *See* Ex. O.

113. This was suspicious because the Marketplace Website provides no method by which a customer could actually leave a review for a decorator.

114. Upon closer inspection, it appears that the reviews are almost all five-stars and created on or about the same day for each decorator.

115. By way of limited example only, all sixteen reviews for “Kirkwood Trading Company” are five-star reviews and were all created on June 25, 2019. (*See* Kirkwood reviews page attached hereto as **Exhibit “P”**).

116. By way of additional example, all fifteen reviews for “Teeth Like Swords Printing” are five-star reviews, and fourteen of the fifteen reviews were created on July 19, 2019 (the fifteenth was created on July 20, 2019). (*See* Teeth Like Swords reviews page attached hereto as **Exhibit “Q”**).

117. By way of additional example, all twelve reviews for “Paper Root Printing Co” were created on July 5, 2019, and eleven of the twelve reviews are five-star reviews (the twelfth is a four star review). (*See* Paper Root Reviews page attached hereto as **Exhibit “R”**).

118. Notably, there were no reviews for any of those companies before or after the date on which all of the reviews were posted on the Marketplace Website.

119. Upon information and belief, Defendants created fake reviews to falsely attribute quality to their Marketplace Website and create confusion about the apparel decorators they market.

120. Such conduct is likely to harm other apparel decorators, including Printfly's flagship company, ROT.

121. To the extent that Defendants created fake reviews for their Marketplace Website, they also knowingly and purposely made misrepresentations of fact about the products and product offerings on their website.

Solicitation Using Converted Confidential Lists

122. Separately, upon information and belief, Defendants Decorated Apparel Business has solicited and continues to solicit decorators seeking to compete with ROT from a proprietary and confidential list that was unlawfully obtained by one of Defendants' executive level employees, Buchanan from his prior employer Alpha.

123. Additionally, upon information and belief, Defendants are soliciting customers for their Marketplace Website from this proprietary and confidential list as well.

124. Upon information and belief, Defendants' CEO, Serflek knew or should have known that Buchanan unlawfully retained the list and that Buchanan was soliciting from an unlawfully obtained list, but nevertheless instructed and/or allowed him to proceed.

125. The use of this list has granted Defendants access to decorators and customers' contact information that they wouldn't otherwise possess and enabled them to build and market their Decorated Apparel Business much faster than they would have been able to otherwise.

126. Defendants ability to obtain in excess of 50 decorators in a short period of time for their Decorated Apparel Business, in reliance on unlawfully retained customer information amounts to unfair competition and has caused and/or is likely to cause harm to competition in the apparel industry, including to the Plaintiff.

COUNT I
(FALSE AND DECEPTIVE ADVERTISING – LANHAM ACT 15 U.S.C. § 1125(a)(1)(B))
PRINTFLY v. ALL DEFENDANTS

127. Plaintiff incorporates all preceding paragraphs as though set forth fully herein.

128. The Lanham Act’s relevant section provides:

Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which ... in commercial advertising or promotion, misrepresents the nature, characteristics, qualities, or geographic origin of his or her or another person's goods, services or commercial activities, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

15 U.S.C. § 1125(a)(1)(B).

129. As described above, Defendants have engaged in various acts of false advertising and deceptive trade practices regarding their products, including without limitation, (i) using bait and switch pricing tactics; (ii) falsely claiming that they offer the “cheapest” products; (iii) misrepresenting the quality of their products as the “best” products; (iv) continuously running the same artificial promotions; and (v) misrepresenting retail pricing and bulk order discounts.

130. Defendants’ false and misleading representations have deceived and/or have a tendency to deceive a substantial portion of customers seeking to purchase blank and decorated apparel.

131. Defendants' false and misleading representations regarding price, quality, expiring promotions, and bulk order discounts are material and likely to influence purchase decisions.

132. Defendants' false and misleading representations have caused and/or are likely to cause consumer confusion, mistake, or deception as to the quality, accuracy, and legitimacy of Defendants' products and information about those products.

133. Defendants' operation of an online retail website resulted in the goods traveling in interstate commerce.

134. There is a likelihood of injury to Plaintiff's subsidiary TDR and other apparel retailers in the blank and decorated apparel space resulting from Defendants' conduct.

135. Upon information and belief, Defendants' unlawful conduct, which dates back to at least 2016 has helped propel Defendants in the resale of blank apparel space at the expense of other companies in the industry.

136. The ongoing acts of Defendants constitute false and deceptive advertising in violation of Section 43(a)(1)(B) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(B).

137. Issuance of injunctive relief is justified by Defendant's conduct, is needed to avert irreparable harm, is justified by the balance of the equities, and is in the public interest.

138. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to an Order requiring Defendants to account for any and all profits and other ill-gotten gains Defendants derived from their misrepresentations as to the nature, characteristics and qualities of its goods and services in commercial advertising and promotion, and to an Order awarding all damages sustained by reason of Defendants' conduct.

139. Defendants' actions have been willful, malicious and fraudulent, with knowledge of the likelihood of deception, and with intent to deceive.

140. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to recover multiplied or enhanced damages.

141. This is an “exceptional case” under 15 U.S.C. § 1117(a), and therefore Plaintiff is entitled to an award of attorneys’ fees and costs.

WHEREFORE, Printfly requests a judgment in its favor against Defendant including a finding that Defendants willfully engaged in false advertising in violation of the Lanham Act, causing harm in excess of \$50,000, including but not limited to disgorgement of all profits realized by Defendants as a result of its unfair competition and false advertising, plus, to the extent available, an award of treble damages of three times the amount of Defendants’ illicit profits, and reasonable attorneys’ fees and costs, along with pre-judgment interest, and injunctive relief compelling Defendants to remove from public view any and all such false advertising, together such other relief as the Court deems equitable and just.

COUNT II
(FALSE AND DECEPTIVE ADVERTISING – LANHAM ACT 15 U.S.C. § 1125(a)(1)(A))
PRINTFLY v. ALL DEFENDANTS

142. Plaintiff incorporates all preceding paragraphs as though set forth fully herein.

143. The Lanham Act’s relevant section provides:

Any person who, on or in connection with any goods or services, or any container for goods, uses in commerce any word, term, name, symbol, or device, or any combination thereof, or any false designation of origin, false or misleading description of fact, or false or misleading representation of fact, which ... is likely to cause confusion, or to cause mistake, or to deceive as to the affiliation, connection, or association of such person with another person, or as to the origin, sponsorship, or approval of his or her goods, services, or commercial activities by another person, or, shall be liable in a civil action by any person who believes that he or she is or is likely to be damaged by such act.

15 U.S.C. § 1125(a)(1)(A).

144. As described above, Defendants have made false or misleading representations of fact and quality in the reviews on their Blanks Website and on their Decorative Website by creating and posting fake reviews on their website.

145. Defendants' false and misleading representations have deceived and/or have a tendency to deceive a substantial portion of customers seeking to decorated apparel and have, upon information and belief, deceived search engines (including Google) resulting in higher positioning in search results.

146. Defendants' false and misleading representations are likely to influence purchase decisions.

147. Defendants' false and misleading representations have caused and/or are likely to cause consumer confusion, mistake, or deception as to the quality, accuracy, and legitimacy of Defendants' products and information about those products.

148. Defendants' operation of an online retail website resulted in the goods traveling in interstate commerce.

149. There is a likelihood of injury to Plaintiff's flagship brand ROT, subsidiary TDR and other apparel retailers in the blank and decorated apparel space resulting from Defendants' conduct.

150. Upon information and belief, Defendants' unlawful conduct, which dates back to at least 2016 has helped propel Defendants in the resale of apparel space at the expense of other companies in the industry.

151. The ongoing acts of Defendants constitute false and misleading representations of fact relating to the approval of Defendants' goods in violation of Section 43(a)(1)(A) of the Lanham Act, 15 U.S.C. § 1125(a)(1)(A).

152. Issuance of injunctive relief is justified by Defendant's conduct, is needed to avert irreparable harm, is justified by the balance of the equities, and is in the public interest.

153. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to an Order requiring Defendants to account for any and all profits and other ill-gotten gains Defendants derived from their misrepresentations and to an Order awarding all damages sustained by reason of Defendants' conduct.

154. Defendants' actions have been willful, malicious and fraudulent, with knowledge of the likelihood of deception, and with intent to deceive.

155. Pursuant to 15 U.S.C. § 1117(a), Plaintiff is entitled to recover multiplied or enhanced damages.

156. This is an "exceptional case" under 15 U.S.C. § 1117(a), and therefore Plaintiff is entitled to an award of attorneys' fees and costs.

WHEREFORE, Printfly requests a judgment in its favor against Defendant including a finding that Defendants willfully engaged in false advertising in violation of the Lanham Act, causing harm in excess of \$50,000, including but not limited to disgorgement of all profits realized by Defendants as a result of its unfair competition and false advertising, plus, to the extent available, an award of treble damages of three times the amount of Defendants' illicit profits, and reasonable attorneys' fees and costs, along with pre-judgment interest, and injunctive relief compelling Defendants to remove from public view any and all such false advertising, together such other relief as the Court deems equitable and just.

COUNT III
(PENNSYLVANIA COMMON LAW UNFAIR COMPETITION)
PRINTFLY v. ALL DEFENDANTS

157. Plaintiff incorporates all preceding paragraphs as though set forth fully herein.

158. Pennsylvania's common law cause of action for unfair competition mirrors the Lanham Act's cause of action for unfair competition, except that under state law, there is no requirement that the goods traveled through interstate commerce. *See Louis Vuitton Malletier & Oakley, Inc. v. Veit*, 211 F.Supp.2d 567, 582 (E.D. Pa. 2002), amended (June 28, 2002).

159. As set forth above, Defendants have made material misrepresentations of fact and have engaged in deceptive trade practices regarding their products, including without limitation, (i) using bait and switch pricing tactics; (ii) falsely claiming that they offer the "cheapest" products; (iii) misrepresenting the quality of their products as the "best" products; (iv) continuously running the same artificial promotions; (v) misrepresenting retail pricing and bulk order discounts; and (vi) posting fake reviews on their websites.

160. Defendants' false and misleading representations have deceived and/or have a tendency to deceive a substantial portion of customers seeking to purchase blank and decorated apparel.

161. Defendants' false and misleading representations have deceived and/or have a tendency to deceive search engine results and falsely attribute quality and priority to Defendants' search engine listings.

162. Defendants' false and misleading representations regarding price, quality, expiring promotions, and bulk order discounts are material and likely to influence purchase decisions.

163. Defendants' false and misleading representations have caused and/or are likely to cause consumer confusion, mistake, or deception as to the quality, accuracy, and legitimacy of Defendants' products and information about those products.

164. Defendants conduct is aimed at diverting business from other companies in the blank and decorated apparel industry, including Plaintiff, by means of fraudulent misrepresentations and misleading advertising.

165. There is a likelihood of injury to Plaintiff's flagship brand, ROT and Plaintiff's subsidiary TDR and other apparel retailers in the blank and decorated apparel space resulting directly from Defendants' conduct.

166. Upon information and belief, Defendants' unlawful conduct, which dates back to at least 2016 has helped propel Defendants in the resale of apparel space at the expense of other companies in the industry.

167. Defendants' engaged in such deceptive and misleading conduct in an effort to increase sales of its products.

168. Defendants have made and continue to make substantial profits as a result of their deceptive and misleading conduct.

169. Defendants' conduct is improper, unlawful, and in violation of Pennsylvania Common Law relating to unfair competition and misleading advertising.

170. Defendants' conduct is knowing, purposeful, and reckless and justifies the imposition of exemplary damages.

171. Plaintiff has no adequate remedy at law and are entitled to preliminary and permanent injunctive relief.

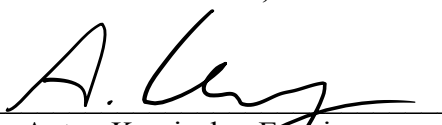
WHEREFORE, Printfly requests a judgment in its favor against Defendant including a finding that Defendants willfully engaged in fraudulent misrepresentations about their business and misleading advertising under the Pennsylvania Unfair Competition Act, causing harm in excess of \$50,000, including but not limited to disgorgement of all profits realized by Defendants

as a result of its misrepresentations and misleading statements, plus, to the extent available, exemplary damages, Plaintiff's attorneys' fees and costs incurred in bringing and maintaining this action, along with pre-judgment interest, and injunctive relief compelling Defendants to remove from public view any and all such misrepresentations and misleading advertising, together such other relief as the Court deems equitable and just.

Respectfully Submitted,

BOCHETTO & LENTZ, P.C.

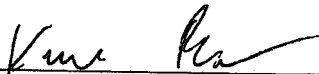
Date: January 15, 2020

By: 
Anton Kaminsky, Esquire
Attorney for Plaintiff

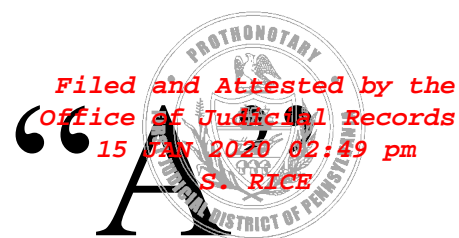
VERIFICATION

I, Kane Posner, hereby verify that the statements made in the foregoing *Amended Complaint* are true and correct to the best of my knowledge, information and belief. I am aware that false statements of fact made knowingly are subject to the penalties of 18 Pa. C.S.A. § 4904 relating to unsworn falsification to authorities.

September 23, 2019
Date


Kane Posner, Executive Vice President
Printfly Corporation

EXHIBIT



WORK PRODUCT REDACTION

----- Forwarded message -----

From: **JiffyShirts.com Orders** <orders@jiffyshirts.com>

Date: Fri, May 17, 2019 at 4:26 PM

Subject: Order 22649958 Confirmation

To: <glentz@bochettoandlentz.com>



Order Confirmation

Order 22649958

Hi Gavin,

Thank you for shopping with JiffyShirts.com! Here is your order summary.

Shipping Address:

Gavin Lentz
1524 Locust St
PHILADELPHIA , PA 19102

Billing Address:

Gavin Lentz
1524 Locust St
PHILADELPHIA , PA 19102

Your Order

Product Total:	\$7.63
Shipping:	\$7.95
Total:	\$15.58

Order #:	22649958
Order Date:	Fri, May 17, 2019
Payment:	American Express XXXX-XXXX-XXXX-7001
Shipping:	UPS Ground
Delivery:	Mon, May 20, 2019

Delivery: Arriving Mon, May 20, 2019

Unisex Triblend Short-Sleeve T-Shirt

Teal Triblend
L

BELLA+CANVAS
LOS ANGELES
3413C

\$7.63

1

\$7.63

Case ID: 190509004



Please inspect your delivered order.
Claims for missing, wrong, or damaged items must be made within
3 days of final delivery (by Thu, May 23, 2019).
Returns within 45 days (by Mon, July 1, 2019).



Return, Refunds & Exchanges
[Read More](#)



Have a Question?
[Contact Us](#)

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--
Gavin P. Lentz, Esquire
Bochetto & Lentz P.C.
[1524 Locust St.](#)
[Philadelphia, PA 19102](#)
215-735-3900
www.bochettoandlentz.com

WORK PRODUCT REDACTION

Begin forwarded message:

From: "JiffyShirts.com Orders" <orders@jiffyshirts.com>
Date: May 17, 2019 at 7:05:49 PM EDT
To: glentz@bochettoandlantz.com
Subject: Shipment for Order 22649958



Shipment Confirmation

Order 22649958

Hi Gavin,

Shipment for Order# 22649958 has shipped from our warehouse. The details are below.

Shipment Details

Shipping To:

Gavin Lentz
[1524 Locust St](#)
PHILADELPHIA, PA
19102 4401

Shipping:

UPS Ground

Tracking:

1ZA82T890307894968

[View Tracking Information](#)

Delivery: Arriving Mon, May 20, 2019

Unisex Triblend Short-Sleeve T-Shirt

Teal Triblend
L

BELLA+CANVAS
LOS ANGELES
3413C

Case ID: 190509004

\$7.63**1****\$7.63**

Please inspect your delivered order.
Claims for missing, wrong, or damaged items must be made within
3 days of final delivery (by Thu, May 23, 2019).
Returns within 45 days (by Mon, July 1, 2019).



Return, Refunds & Exchanges
[Read More](#)



Have a Question?
[Contact Us](#)

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WORK PRODUCT REDACTION

Begin forwarded message:

From: "JiffyShirts.com Orders" <orders@jiffyshirts.com>
Date: May 21, 2019 at 1:46:12 AM EDT
To: glentz@bochettoandlentz.com
Subject: Your shipment was delivered! Jiffyshirts Order 22649958



Shipment Delivered

Order 22649958

Hi Gavin,

Delivery for Order# 22649958 was delivered.

RECEIVED AT: Mon, May 20, 2019 4:23 PM EDT

Thanks for shopping with JiffyShirts.com!

Shipment Details

Shipping To:

Gavin Lentz
[1524 Locust St](#)
PHILADELPHIA, PA
19102 4401

Shipping:

UPS Ground

Tracking:

1ZA82T890307894968

[View Tracking Information](#)

Delivery: Delivered Mon, May 20, 2019

Unisex Triblend Short-Sleeve T-Shirt

Case ID: 190509004



Teal Triblend
L

BELLA+CANVAS
LOS ANGELES
3413C

\$7.63

1

\$7.63

Please inspect your delivered order.
Claims for missing, wrong, or damaged items must be made within
3 days of final delivery (by Thu, May 23, 2019).
Returns within 45 days (by Mon, July 1, 2019).
[Return Items](#)



Return, Refunds & Exchanges
[Read More](#)



Have a Question?
[Contact Us](#)

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EXHIBIT “B”

Wholesale Blank Shirts - JiffyShirts.com

JiffyShirts.com (US) L.P. [US] | jiffyshirts.com

Search for products

Sign In Your Orders Contact Us

T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

View Cart

LOWEST TOTAL PRICE BULK DISCOUNT AT \$80 FREE SHIPPING AT \$59 \$49 ORDER BY 6PM SHIPS TODAY FREE RETURNS DELIVERY DATE IN CART

19102 (change)

Delivery In

1 day
2 days
3 days

Category

T-Shirts (803)
Women's Shirts (588)
Sweatshirts (395)
Jackets (368)
Hats (298)
Polo Shirts (285)
Bags (209)
Kid's Shirts (156)
Dress Shirts (153)
Pants & Shorts (114)
Household Items (83)
High Viz (74)
Accessories (7)

Cut

Adult (1,123)
Women (721)
Men (634)
Youth (146)
Infant (32)
Toddler (28)
Girl's (13)

Blend

Solid (2,527)
Blended (979)

Color

Black (2,359)
Navy (1,718)
Gray (1,720)
Purple (522)
Green (1,243)
Royal (1,092)
Heather (660)
Red (1,622)
Neon (139)
Yellow (450)
Blue (1,132)
White (1,502)
Khaki (270)
Orange (443)

Cheapest Priced T-Shirts

Image	Price	Brand	Features	Rating	Count	Size
	from \$1.62	GILDAN	Top Seller, Sale	★★★★★	(17386)	G500
Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt						
	from \$1.56	FRUIT & LOOM	Top Seller	★★★★★	(5723)	3931
Adult Unisex 5 oz. HD Cotton™ T-Shirt						
	from \$2.10	GILDAN	Top Seller, Sale	★★★★★	(3667)	G200
Adult Unisex Ultra Cotton® 6 oz. T-Shirt						
	from \$1.99	JERZEES	Top Seller	★★★★★	(3015)	29M
Adult Unisex 5.6 oz. DRI-POWER® ACTIVE T-Shirt						

Best Quality T-Shirts

Image	Price	Brand	Features	Rating	Count	Size
	from \$3.92	BELL+CANVAS	Soft Feel	★★★★★	(4480)	3001C
Unisex Jersey Short-Sleeve T-Shirt						
	from \$7.39	BELL+CANVAS		★★★★★	(923)	3413C
Unisex Triblend Short-Sleeve T-Shirt						
	from \$6.57	ANVIL		★★★★★	(264)	6750
Adult Unisex Triblend T-Shirt						
	from \$3.99	ALTERNATIVE		★★★★★	(1)	AA1070
Unisex Basic Crew						

4.8 ★★★★★ Google Customer Reviews

EXHIBIT “C”

EXHIBIT “D”

Fruit of the Loom 3931 Adult 5 x +

JiffyShirts.com (US) L.P. [US] | jiffyshirts.com/fruitoftheloom-3931.html?ac=Retro+Heather+Purple

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T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST TOTAL PRICE **BULK DISCOUNT AT \$80** **FREE SHIPPING AT \$59 \$49** **ORDER BY 6PM SHIPS TODAY** **FREE RETURNS** **DELIVERY DATE IN CART**

Adult Unisex 5 oz. HD Cotton™ T-Shirt

Rating: ★★★★★ Recommend: 97% Reviews: 5723

SAVE 72%


Retail	White	Gray	Color
\$5.56 sizes S - XL	\$1.56	\$2.79	\$2.79

BULK BUYERS

Cart Above	White	Gray	Color
\$80	\$1.56	\$2.79	\$2.79
\$150	\$1.56	\$2.79	\$2.79
\$250	\$1.56	\$2.26	\$2.26
\$500	\$1.56	\$2.20	\$2.20
\$1,000	\$1.56	\$2.18	\$2.18
\$1,750	\$1.56	\$2.15	\$2.15
\$3,800	\$1.56	\$2.12	\$2.12

Use Bulk Buyer Order Entry

1. Pick Color

Pick Color  Retro Heather Purple

2. Choose Size & Enter Quantities

Size	Price	Stock
S	\$5.56 \$2.79	3931 in stock
M	\$5.56 \$2.79	3931 in stock
L	\$5.56 \$2.79	3931 in stock
XL	\$5.56 \$2.79	3931 in stock
2XL	\$9.42 \$5.42	540 in stock
3XL	\$10.72 \$8.05	999 in stock
4XL	\$10.99 \$8.14	315 in stock
6XL	\$11.24 \$8.14	6 in stock

Model: 3931
Cotton: 100%
Weight: 5 Oz
Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL, 6XL

Features:

- Seamless 1x1 ribbed collar
- High-density fabric for exceptional printing clarity
- Double-needle stitched sleeves and bottom hem
- Double-needle coverstitched front neck
- Shoulder-to-shoulder tape
- Neons, Retro Heathers & Safety Colors are 50/50 cotton/poly
- Black Heather 50/50 cotton/poly
- Athletic Heather is 90/10 cotton poly
- Ash is 98/2% cotton/poly
- 100% cotton preshrunk jersey

See Matching Products
See Similar Products

Featured Review **Measurements**

I have ordered the products from Jiffy several times now with

4.8 ★★★★★
Google Customer Reviews


Gildan G200 Adult Ultra Cotton® x +

JiffyShirts.com (US) L.P. [US] | jiffyshirts.com/gildan-G200.html?ac=Charcoal

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T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST TOTAL PRICE **BULK DISCOUNT AT \$80** **FREE SHIPPING AT \$59 \$49** **ORDER BY 6PM SHIPS TODAY** **FREE RETURNS** **DELIVERY DATE IN CART**



Adult Unisex Ultra Cotton® 6 oz. T-Shirt

Rating: ★★★★★ Recommend: 98% Reviews: 3687

SAVE 67%

Retail	White	Gray	Color
\$6.42 sizes S - XL	\$2.10	\$2.24	\$2.77

BULK BUYERS

Cart Above	White	Gray	Color
\$80	\$2.10	\$2.24	\$2.77
\$150	\$2.10	\$2.24	\$2.77
\$250	\$2.08	\$2.24	\$2.41
\$500	\$2.05	\$2.24	\$2.37
\$1,000	\$2.03	\$2.22	\$2.35
\$1,750	\$2.03	\$2.22	\$2.35
\$3,800	\$2.03	\$2.22	\$2.35

1. Pick Color

Pick Color Charcoal

2. Choose Size & Enter Quantities

	S	M	L	XL
\$6.42 \$2.77	000+ in stock	000+ in stock	000+ in stock	000+ in stock
\$10.92 \$5.73	2XL 000+ in stock			
\$12.59 \$7.26	3XL 225 in stock	4XL No Stock	5XL No Stock	

ADD TO CART

GILDAN

Model: G200
Cotton: 100%
Weight: 6 Oz
Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL

Features:

- ▶ Taped neck and shoulders
- ▶ Seamless double-needle 7/8" collar
- ▶ Double-needle sleeve and bottom hem
- ▶ Tear away label
- ▶ Heathers and Safety colors are 50/50
- ▶ Antique colors are 90/10
- ▶ Sport Grey is 90/10
- ▶ Ash Grey is 99/1
- ▶ 6 oz., 100% preshrunk cotton

See Matching Products
See Similar Products

Free Return Shipping
Try it on. Not for you? Easy Returns.
Free return shipping labels for the next 45 days.

Featured Review Measurements

This is my favorite brand of shirt to use for heat press transfers
★★★★★ from Scott on Fri, Sep. 22, 2006

4.8 ★★★★★
Google Customer Reviews

Jerzees 29M Adult 5.6 oz. DRI-POWER® ACTIVE T-Shirt

JiffyShirts.com (US) L.P. [US] | jiffyshirts.com/jerzees-29M.html?ac=Neon+Pink

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T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST TOTAL PRICE **BULK DISCOUNT AT \$80** **FREE SHIPPING AT \$59 \$49** **ORDER BY 6PM SHIPS TODAY** **FREE RETURNS** **DELIVERY DATE IN CART**

Adult Unisex 5.6 oz. DRI-POWER® ACTIVE T-Shirt

Rating: ★★★★★ Recommend: 97% Reviews: 3015


SAVE 67%

Retail	White	Gray	Color
\$6.02 sizes S - XL	\$1.99	\$2.46	\$2.99

BULK BUYERS

Cart Above	White	Gray	Color
\$80	\$1.99	\$2.46	\$2.99
\$150	\$1.99	\$2.46	\$2.99
\$250	\$1.99	\$2.08	\$2.42
\$500	\$1.99	\$2.08	\$2.36
\$1,000	\$1.99	\$2.08	\$2.33
\$1,750	\$1.99	\$2.08	\$2.30
\$3,800	\$1.99	\$2.08	\$2.27

1. Pick Color

Pick Color  Neon Pink

2. Choose Size & Enter Quantities

S **M** **L** **XL**

~~\$6.02~~
\$2.99 No Stock

2XL
~~\$6.04~~
\$5.91 No Stock

3XL
~~\$12.48~~
\$9.14 No Stock

4XL
~~\$12.48~~
\$9.27 No Stock

5XL
~~\$12.48~~
\$9.39 1/0

JERZEES

Model: 29M
Cotton: 50/50
Weight: 5.6 Oz
Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL

Features:

- ▶ Tearaway label
- ▶ Seamless body for a wide printing area
- ▶ Seamless 1x1 rib collar
- ▶ Oxford is 53% polyester, 47% cotton
- ▶ Double-needle stitched hemmed sleeves and bottom
- ▶ Shoulder-to-shoulder tape
- ▶ Double-needle coverstitched front neck
- ▶ 50% cotton, 50% polyester

See Matching Products
See Similar Products

Featured Review **Measurements**

I have always loved the Jerzees 50/50 T-shirts
★★★★★ from Sharol on Mon, Nov. 16, 2009

4.8 ★★★★★
Google Customer Reviews

EXHIBIT “E”

Cotton (1,369)
 Certified
 Organic (31)
 Combed
 Ringspun (272)
 Organic (51)
 Preshrunk (208)
 Recycled (27)
 Ringspun (237)
 USA
 Certified (10)
 Denim (17)
 Lycra (11)
 Nylon (45)
 PVC (3)
 Performance (193)
 Polyester (1,640)
 Rayon (133)
 Spandex (236)

Thickness
 Light (under 5oz)
 (2,718)
 Regular (5-6oz) (5)
 Heavy (over 6oz)
 (3)

Size
 One Size (561)
 XXS (14)
 XS (717)
 XS/S (21)

Adult Unisex 5.2 oz. 100% Cotton T-Shirt
 Unisex 5.2 oz. 100% Cotton T-Shirt
 Adult Unisex 5.2 oz. ComfortSoft® Cotton T-Shirt
 Adult Unisex 5.2 oz. EcoSmart® T-Shirt

Softest Unisex T-Shirts

Product	Price	Brand	Rating	Count	Weight
Lightweight T-Shirt	from \$2.74	ANVIL	★★★★★	(2364)	980
Unisex Poly-Cotton Short-Sleeve T-Shirt	from \$5.29	BELLA+CANVAS	★★★★★	(546)	3650
Adult Unisex 4.7 oz. Sofspun® Jersey Crew T-Shirt	\$2.88	FRUIT&LOOM	★★★★★	(155)	SF45R
Unisex Triblend Short-Sleeve T-Shirt	from \$5.29	FRUIT&LOOM	★★★★★	(81)	102A

Safetywear

Bella+Canvas 3650 Unisex Poly- (X) +

JiffyShirts.com (US) L.P. [US] | jiffyshirts.com/bellacanvas-3650.html?ac=Black+Mar... Search for products: Sign in Your Orders Contact Us 300 View Cart

JIFFY SHIRTS.com T-SHIRTS SWEATSHIRTS POLOS PANTS HATS BAGS MORE

LOWEST TOTAL PRICE >> BULK DISCOUNT IN EFFECT FREE SHIPPING FOR THIS ORDER ORDER BY 6PM SHIPS TODAY FREE RETURNS DELIVERY DATE IN CART

Unisex Poly-Cotton Short-Sleeve T-Shirt

Rating: ★★★★★ Recommend: 97% Reviews: 546

SAVE 57%


Retail	All Colors
\$12.18	\$5.29
sizes XS - XL	

BULK BUYERS

Cart Above	All Colors
\$80	\$5.29
\$150	\$5.29
\$250	\$5.00
\$500	\$4.92
\$1,000	\$4.76
\$1,750	\$4.44
\$3,800	\$4.44

Use Bulk Buyer Order Entry

1. Pick Color

Pick Color  **Black Marble**

2. Choose Size & Enter Quantities

Size	Price	Stock
XS	\$7.40	582 in stock
S	\$7.40	542 in stock
M	\$7.40	382 in stock
L	\$7.40	382 in stock
XL	\$7.40	764 in stock
2XL	\$9.56	308 in stock

ADD TO CART

Prices already bulk discounted

Free Return Shipping
Try it on. Not for you? Easy Returns.
Free return shipping labels for the next 45 days.

BELLA+CANVAS
4.8 ★★★★★

Model: 3650
Cotton: 52%
Weight: 3.6 Oz
Sizes: XS, S, M, L, XL, 2XL

Features:

- Tear-away label
- Unisex sizing
- Sideseamed
- Retail fit
- Speckled - 3.8 oz., 50% poly, 25%combed ring spun cotton, 25% rayon, 30 singles
- Slub - 3.8 oz., 50% poly, 37.5%combed ring spun cotton, 12.5% rayon, 30 singles
- Black Mineral Wash is 4.2 oz., 100% Airlume combed and ring-spun cotton, 32 singles
- Acid wash colors - 4.2 oz., 52% combed ring spun cotton, 48% poly, 30 singles
- Marble colors are 4 oz., 91% polyester, 9%combed ring spun cotton, 30 singles
- 40 singles
- 3.6 oz., 52% combed and ring spun cotton, 48% polyester

See Similar Products

4.8 ★★★★★
Google Customer Reviews

EXHIBIT “F”

jiffyshirts - Google Search

google.com/search?q=jiffyshirts&rlz=1C1CHBF_enUS832US832&oq=jiffyshirts&aqs=chrome..69j57j0j69i60j4.2111j0j4&sourceid=chrome&ie=UT...

Google jiffyshirts

All Shopping Images News Maps More Settings Tools

About 174,000 results (0.42 seconds)

JiffyShirts.com | T-Shirts For Cheap At \$1.75

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We Offer Fashionable, Comfortable and High-Quality T-Shirts For Both Men and Women. Fast Delivery, Bulk Discounts, Always In Stock & Cheapest Prices. Buy Today. Ships today. Free shipping & Returns. Bulk discounts. Types: T-Shirts, Sweatshirts, Pants & Shorts, Polo Shirts.

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---	---

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Bulk Jiffyshirts. Fast Delivery & Free Shipping - Always In Stock
Gildan T-shirts Wholesale · Sweatshirts Wholesale · Wholesale Golf Shirts

\$1.68 - Blank Tees | Fast Free Delivery | CheapestTees.com

(Ad) www.cheapesttees.com/

Free Returns - Lowest Prices Online. Family Owned And Operated. Multiple Payment Options.
Short Sleeve T-Shirts · Long Sleeve T-Shirts · Women's T-Shirts · Youth & Baby T-Shirts

Wholesale Blank Shirts - JiffyShirts.com

<https://www.jiffyshirts.com>

JiffyShirts.com has the lowest prices fastest delivery Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee Shirts, knit shirts, fleece pullovers, denim ...

<p>Bella+Canvas</p> <p>Ladies' Jersey Short-Sleeve Deep V-Neck T-Shirt. Bella+Canvas ...</p>	<p>Gildan</p> <p>Top Seller; Sale. Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt ...</p>
<p>Blank T-Shirts</p> <p>Long Sleeve - Hanes 5250T Candy Orange - Tank Tops - ...</p>	<p>Kid's Shirts</p> <p>Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee ...</p>

EXHIBIT “G”

Order Summary**Shipping Address**

WILLIAMSBURG, VA
23185
United States

Billing Address

WILLIAMSBURG, VA
23185
United States

Order Total

Product Total:	\$1.62
Shipping:	\$5.95
Applicable Sales Tax:	\$0.12
Processing Tax Fee:	\$0.83
Total:	\$8.52

Contact Information**Payment Information****Your cart: 1 item**

Delivery: Arriving Tue, Sep. 24, 2019



Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt

White
L

GILDAN
G500

\$1.62


1

\$1.62


EXHIBIT “H”


Checkout

Printfly Corporation [US] | rushorderteetees.com/cart/#/summary

 **RUSH ORDER TEES**

Printing Experts
Since 2002

 **(800) 620-1233**
Talk to an Expert Now

 **Live Chat**
Chat with us now


Your Order Summary

[Add Notes or Special Instructions](#)

Continue to Next Step


Test [Edit Design](#) [Remove this Design](#) [Add Garment](#)

G500 by Gildan Adult 5.3 oz. T-Shirt



Color : White
L-1
[Edit Sizes](#)

1 items

 Add Another Color

4.16 each

[Add Another Design](#)

Choose your Delivery Date

☒ **Free Standard Delivery**
Save 30% off your entire order
Guaranteed on October 4

☐ **Rush Your Delivery**
Guaranteed as early as September 20

☐ **Super Saver Delivery**
Save 32.10% off your entire order
Guaranteed on October 7

Subtotal30.15

Standard Delivery - 30.00% Off-25.99

Shipping & HandlingFREE

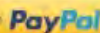
Sales Tax0.29


Voucher

Grand Total (1 items)4.45

Continue to Next Step

Or Checkout With

Pay with 

Pay with 

Shipping

Chat with an Expert




EXHIBIT “I”

CheapestTees.com®

The Lowest-Priced, Name Brand T-Shirts On Earth!

Customer Service

Shipping Info

Special Offers

Call Toll Free:
(800) 758-1299

Track Your Order

Live
Help
Chat Now**Products**

- Short Sleeve T-Shirts
- Polo Shirts
- Sweatshirts / Fleece / Outerwear
- Sweatpants/Shorts
- Long Sleeve T-Shirts
- Women's / Junior Tees & Sweats
- Youth, Infant, Toddler T-Shirts
- Pocket T-Shirts
- Tank Tops
- Organic & Eco-Friendly
- Dress Shirts / Wovens
- Socks
- Hats
- Bags & Totes
- Embroidery
- Screen Printing
- Family Reunion T-Shirts
- Bulk Discounts
- School Purchase Orders
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- Shipping & Delivery
- Return Policy
- Pay By Check
- Can't Find It?
- Tell A Friend
- About Us

>> See What Customers Say...



T-Shirts, Polos, Sweatshirts...

SEARCH

Shipping

Confirmation



Get Shipping and Billing information from PayPal



Pay with your bank account, credit card or balance without sharing your financial information.

Get PayPal Info

Shipping Information**Shipping Address**

Email Address:

Email Address

First Name:

First Name

Last Name:

Last Name

Street Address:

Address

Suite or Apt #:

City:

City

State:

VA Virginia

Zip Code:

23185

Phone:

Phone Number

☒ Please Send Discounts For CheapestTees.com☐ Would you like Yahoo Small Business to send you an email asking you to rate this merchant?**Shipping Options**

- ☒ \$3.95 USPS First Class (3-6 days)
Get By Mon, Sep 23
- ☐ \$5.95 SurePost Economy (2-5 days)
Get By Mon, Sep 23
- ☐ \$7.95 FedEx Ground
Get By Fri, Sep 20

Billing Information**Billing Address (Where Your Credit Card Statement is Sent)**☒ Same as Shipping☐ Other**Payment Method**

Pay using Credit Card



Card or account number:

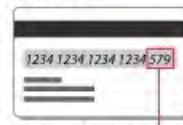
Card Number

Expiration month:

Expiration year:

Card Verification Number:

What's This?



card verification number

OR

Pay using PayPal

Pay with your bank account, credit card or balance without sharing your financial information. [Go to PayPal](#)**Your Order**

Item	Cost
1 Gildan Lightweight 100% Cotton T-Shirt Color : White Size : L	\$1.84
Subtotal:	\$1.84
Shipping:	\$3.95
Tax:	\$0.13
Total:	\$5.92

EXHIBIT “J”

Gildan G500 Heavy Cotton 5.3 oz. x +

shirtmax.com/adult-100-cotton-t-shirts/22-heavy-cotton-53-oz-t-shirt.html?gclid=CjwKCAjwq4fsBRBnEiwANTahcPUzDwfYwKmOiEhRo_Tc9xXra...


SHIRT MAX **SAME DAY SHIPPING** ORDER BY 4PM EST. **BULK DISCOUNTS AVAILABLE** CLICK FOR DETAILS **FREE RETURNS** **FREE SHIPPING** *ON ORDERS OVER \$69 Quick Search

Blog My Account FAQ Contact Returns **McAfee SECURE**


T-Shirts Sweatshirts Polos Womens Kids Bottoms Dress Shirts Hats Jackets Accessories Shop Brands **NEW ARRIVALS FOR 2019** 1 in Cart

Home > Adult 100% Cotton T-Shirts > Heavy Cotton 5.3 oz. T-Shirt


ORDER BY 4PM EST. FOR SAME DAY SHIPPING



CLICK TO ZOOM



Color Picker



GILDAN®

Gildan Heavy Cotton 5.3 oz. T-Shirt

Style: G500
Fabric: 100% Preshrunk Cotton
Weight: 5.3 oz.

Sizes: S, M, L, XL, 2XL, 3XL, 4XL, 5XL

Features:

- 100% preshrunk cotton
- Seamless rib at neck
- Taped shoulder-to-shoulder
- Double-needle stitching throughout
- Tear-away label
- Antique (Cherry Red, Jade Dome, Irish Green, Sapphire, Orange) and Sport Grey are 90% cotton, 10% polyester
- Sunset, Safety Pink, Russet, Neon (Green, Blue), Midnight, Lilac, Blackberry, Tweed, Safety Green, S. Orange, Dark Heather, Graphite Heather, and Heather (Military Green, Radiant Orchid, Red, Sapphire) are 50% cotton, 50% polyester
- Ash Grey is 99% cotton, 1% polyester

Click here to view size chart

Latest Review

★★★★★
Great. Love my purchase. Will definitely purchase again.
MELISSA ..

View All 910 Review(s)

FOR SIZES S-XL

White: **\$1.59**

Neutrals: **\$2.59**

Colors: **\$2.75**

When will I get it?

Enter Delivery Zipcode... **Go!**

4.6 ★★★★★
Google Customer Reviews

EXHIBIT “K”

Free Shipping at \$49 - Free Return Shipping All Orders - 45 Days Returns

Automatic Bulk And Shipping Discounts

Discounted Shipping Rates

Cart Total	Shipping Rate
Cart Total \$49 & Over	FREE SHIPPING! (sale ends Mon, Sep. 30, 2019 - regular \$150 and over)
Under \$49	Ships for only \$5.95

No Hassle Bulk Discounts

Orders \$80 and up are automatically discounted.

The discount percentage increases with higher cart totals. Spend more, save more!

Cart Total	Discount
\$80 - \$149.99	4%
\$150 - \$249.99	10%
\$250 - \$499.99	12% 19%
\$500 - \$999.99	14% 21%
\$1000 - \$1749.99	16% 22%
\$1750 - \$3799.99	16% 23%
\$3800 & Up	17% 24%

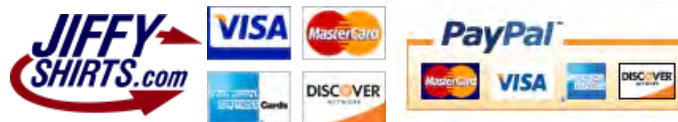
Sale Discounts

Sale items are already reduced from the regular selling price. All orders receive this discount regardless of size.

Sale items may receive additional bulk discounts but usually to a lower maximum rate. The bulk discounts are applied until the maximum percentage is reached.

For example, if a product has a max Bulk Discount of 5%, then 5% is the largest bulk discount to be applied regardless of a cart's total.

The more you add to your cart, the more you save!
No need to ask. No hassle! Your total is automatically discounted in the shopping cart.



Easy Returns

See how we make it easy:

- Buy now and return anytime in the next 45 days.
- Only JiffyShirts.com will provide a free return shipping label for your unwanted items!
- JiffyShirts.com does not charge a restock fee for your return.

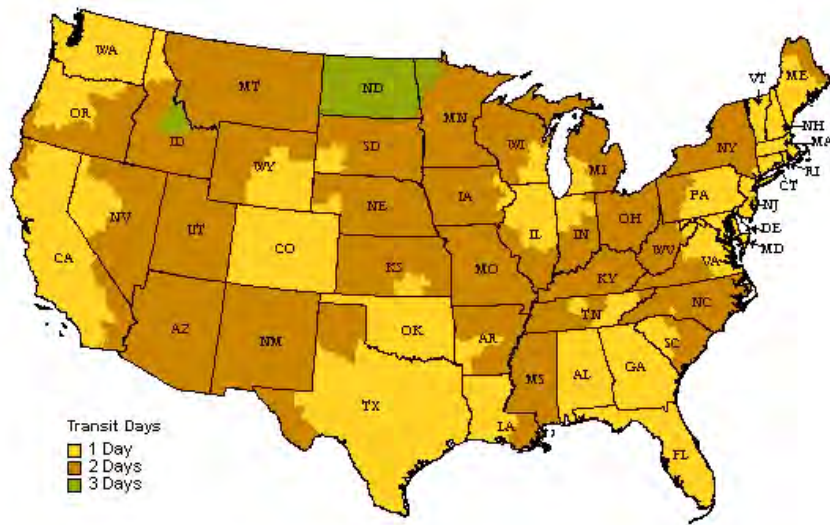
Find full details and exceptions on returns here. Enter your return request quickly here.

98% of orders can be delivered in 1 or 2 days at NO EXTRA CHARGE!

Our Fastest Shipping Times With UPS Ground

4.8 ★★★★★
Google

Customer Reviews
Case ID: 190509004



Shipping - Trust JiffyShirts.com to Deliver!

thank you again for the prompt --speedy speedy service. I am amazed!! Thanks -Jackie

We look forward to continuously ordering from you all -Monica

Thank you for your quick service - Drago

I was extremely impressed with your response time - Joey, LA

Thank you for your notification of shipment of this order - Sandy

Thanks for delivering the shirts so quickly - Marcus

I received my order today I could not believe how quickly I received it. Thank you for your promptness - Suzanne

Here are Some Answers to Frequently Asked Questions about Shipping.

Is it really this fast? Are these dates real?

These dates are real! Our customers can't believe how fast we delivered.

Our dates come directly from UPS based on your shipping address and our 3 closest warehouses. That means at least 3 warehouses could deliver your order by this date. Only at JiffyShirts.com!

We would not order without a delivery date...why should you?

Am I charged extra for "split" or "partial" shipping?

Never. The S & H charge is final. Almost all orders ship from one warehouse. If we need to ship from more than one warehouse, JiffyShirts.com pays...not you!

Why is shipping so cheap?

The answer is simple. We hate paying shipping as much as you do.

So we offer the lowest total price by charging the lowest price for products and the lowest price for shipping. This is cheaper for our customers than hiding shipping costs in our product prices.

Please Note: "UPS Ground" delivery times are not guaranteed. The dates are accurate 99% of the time.

Why JiffyShirts.com Is Different

We want to deliver your shirts quick and cheap. We understand that you may be buying for your company, Church, community group, or a personal event. We know you have important deadlines.

More people making large group purchases use JiffyShirts.com to deliver.

This is why we have invested in shipping quickly through our national warehouse network and directly linking to UPS for delivery dates. Our customers can count on getting what they ordered when they need it. This also means you get your orders the fastest and cheapest with JiffyShirts.com.

To get shipping times and cost, simply add items to your cart. Then enter your shipping City, State, and Zip Code. You will see an estimated delivery date.

4.8 ★★★★★
Google
Customer Reviews
Case ID: 190509004

We will send you a UPS Tracking Number the same day your order ships.

Alaska and Hawaii shipping not offered.

At this time, we only ship within the USA. No international orders.

Payment

We accept Visa, MasterCard, JCB, Discover and American Express credit cards.

We also accept PayPal.


We do not accept P.O. numbers, wires, or checks.

EXHIBIT “L”

https://www.jiffyshirts.com/shipping JUN JUL AUG
◀ 04 ▶
2016 2017 2018

228 captures
1 Apr 2007 - 13 Nov 2017

▼ About this capture

 Toggle navigation

- [Bulk Discount at \\$80](#)
- [Free Shipping at \\$59 \\$49](#)
- [Order by 6pm Ships Today](#)
- [Free Returns](#)
- [Delivery Date in cart](#)



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 - [Blankets](#)



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Filter Filter

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Sorry, we do not ship to AK, DE, HI, AA, AE, AP or any other location outside of the mainland.

https://www.jiffyshirts.com/shipping JUN JUL AUG
 228 captures
 1 Apr 2007 - 13 Nov 2017 2016 2017 2018
 About this capture

Automatic Bulk And Shipping Discounts

Discounted Shipping Rates

Cart Total	Shipping Rate
Cart Total \$49 & Over	FREE SHIPPING! (sale ends July 31st, 2017 - regular \$150 and over)
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Anniversary Sale

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◀ 04 ▶
2016 2017 2018 About this capture

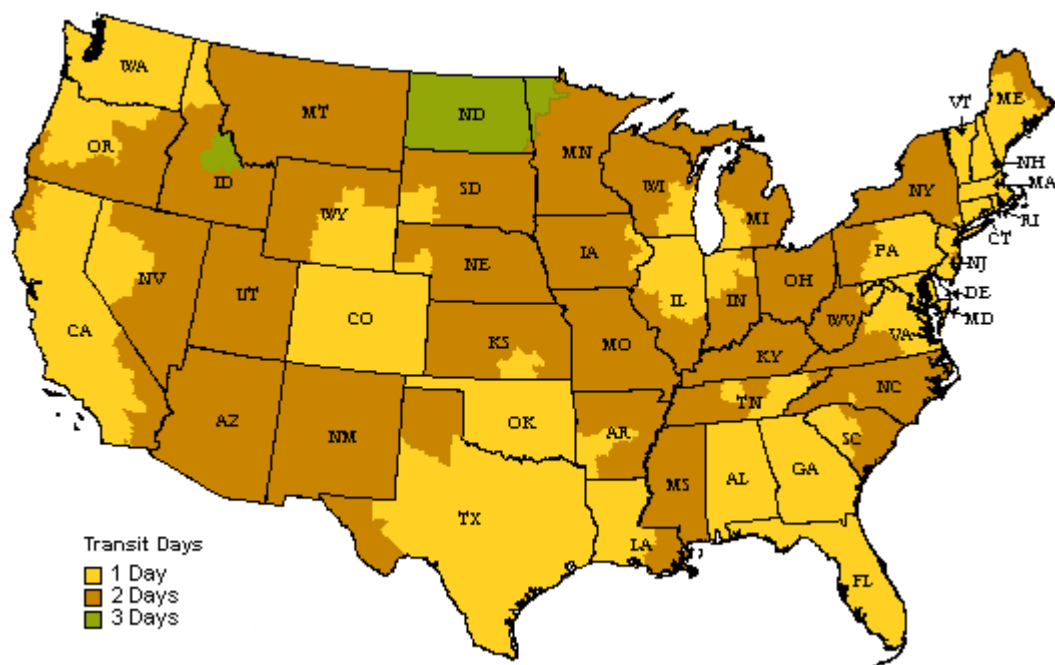
228 captures
1 Apr 2007 - 13 Nov 2017

- Buy now and return or exchange anytime in the next 45 days.
- Only JiffyShirts.com will provide a free return shipping label for your unwanted items!
- JiffyShirts.com does not charge a restock fee for your exchange or return.

Find full details and exceptions on [exchanges and returns here](#). Enter your [exchange or return request quickly here](#).

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We look forward to continuously ordering from you all -Monica

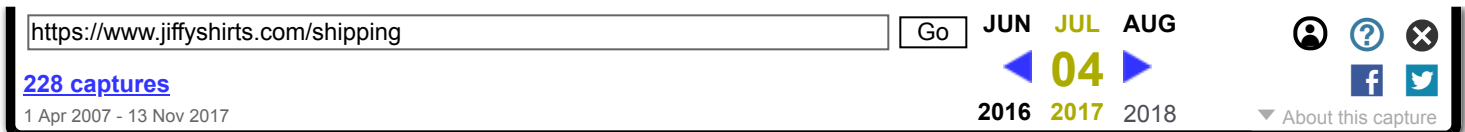
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Case ID: 190509004



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To get shipping times and cost, simply add items to your cart. Then enter your shipping City, State, and Zip Code. You will see shipping rates and an estimated delivery date.

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Alaska, Delaware and Hawaii shipping not offered.

At this time, we only ship within the USA. No international orders.

Payment

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We also accept PayPal.

https://www.jiffyshirts.com/shipping JUN JUL AUG
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- [Dress Shirts](#)
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- [Returns](#)
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Go

MAY JUN AUG

08

2016 2017 2018

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1 Apr 2007 - 13 Nov 2017

Free Shipping at \$49 - Free Return Shipping All Orders - 45 Days Returns

Automatic Bulk And Shipping Discounts

Discounted Shipping Rates

Cart Total	Shipping Rate
Cart Total \$49 & Over	FREE SHIPPING! (sale ends June 30th, 2017 - regular \$150 and over)
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Anniversary Sale

Cart Total	Discount
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\$150 - \$249.99	10%
\$250 - \$499.99	42% 19%
\$500 - \$999.99	44% 21%
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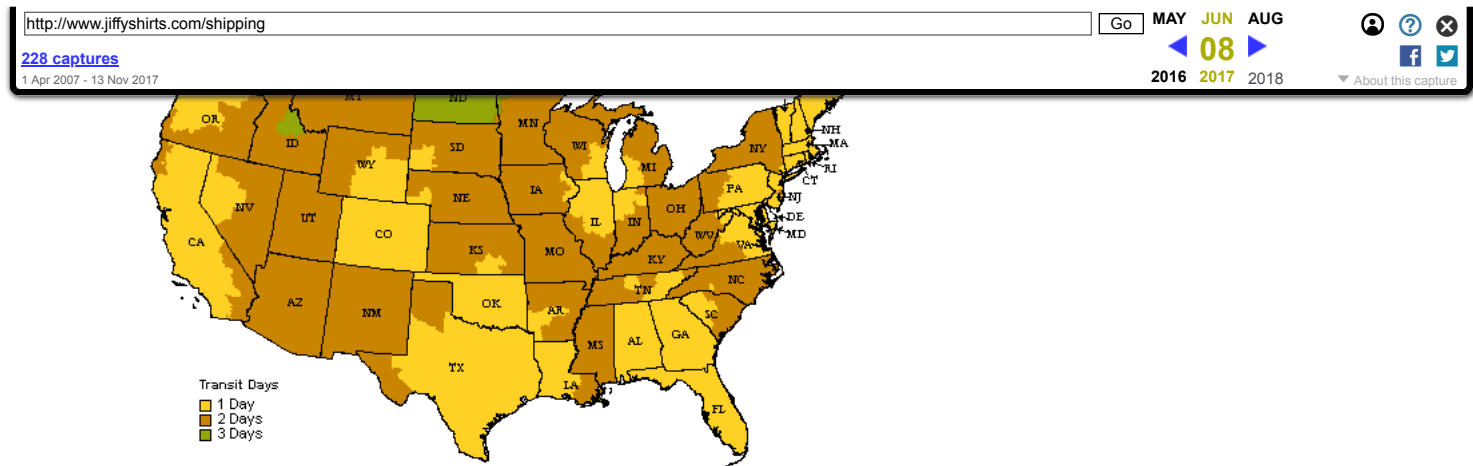
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We do not accept P.O. numbers, wires, or checks.

Case ID: 190509004

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SWEATSHIRTS

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/SWEATSHIRTS) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

PANTS & SHORTS

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POLO SHIRTS

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HIGH VIZ

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/HIGHVIZ) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

DRESS SHIRTS

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/DRESS) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

JACKETS

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/JACKETS) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

HATS

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BAGS

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/BAGS) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

Shop by Fit:

ADULT

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CUT=ADULT)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

CUT=WOMEN)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

MEN

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

YOUTH

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

CUT=YOUTH)

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

TODDLER

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

CUT=TODDLER)

INFANT

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/ADULT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

CUT=INFANT)

Customer Service:

CONTACT US

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/CONTACT) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

RETURNS

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/RETURNS) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

SHIPPING

(/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/SHIPPING) (/WEB/20170608234247/HTTP://WWW.JIFFYSHIRTS.COM/)

PAYMENTS

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EXHIBIT “M”

Delivery: Fri, Sep. 20, 2019
All items in stock. Ships Today!

Sorted By: Item ▼

Your cart: 1,000 items

Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt



White
L

\$1.62

1000

remove

\$1,620.00

GILDAN
G500

Fri, Sep. 20, 2019 All items

On Thursday, shipping 1000 items weighing 420 LBS
to WILLIAMSBURG, 23185.
(change destination)

Pick Shipping Speed \$49 & Over Ships FREE

☒ **FREE Express Shipping**

Fri, Sep. 20, 2019

All items in stock. Ships Today!
Delivery: Fri, Sep. 20, 2019

If ordered in the next
33 minutes

1000 items

\$1,620.00

FREE! Shipping:

\$0.00

Subtotal:

\$1,620.00

Retail Total: \$4,300.00
 Retail Savings: \$2,680.00

No hidden shipping fees. Discounts rounded to the nearest cent.

CHECK OUT

PayPal Check out

The safer, easier way to pay

4.8 ★★★★★
 Google
 Customer Reviews

Case ID: 190509004

Ref Code



EXHIBIT “N”

First Delivery: Fri, Sep. 20, 2019


All items in stock. Ships Today!

Sorted By:

Item

Your cart: 375 items

Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt




Corn Silk
M

~~\$2.67~~
\$2.16

375
remove

~~\$1,001.25~~
\$810.00
Save: \$191.25



Fri, Sep. 20, 2019 122 items

Fri, Sep. 20, 2019 11 items

Mon, Sep. 23, 2019 242 items

On Wednesday, shipping 375 items weighing 157.5 LBS
to WILLIAMSBURG, 23185.
(change destination)

Pick Shipping Speed \$49 & Over Ships FREE

☒ FREE Express Shipping

Fri, Sep. 20, 2019122 items

Fri, Sep. 20, 201911 items

Mon, Sep. 23, 2019242 items


All items in stock. Ships Today!

First Delivery: Fri, Sep. 20, 2019

If ordered in the next
36 minutes

375 items

Bulk Discount:

FREE!  **Shipping:**

\$1,001.25

- \$191.25

\$0.00

Subtotal:

\$810.00

Retail Total: \$2,100.00
Retail Savings: \$1,098.75

No hidden shipping fees. Discounts rounded to the nearest cent.

CHECK OUT



The safer, easier way to pay

Ref Code



4.8 ★★★★★
Google
Customer Reviews

EXHIBIT “O”

Quoting For	ORDER QUANTITY (?) 20	# OF PRINT COLORS (?) 1	DELIVERY TO 19102	FABRIC COLOR 	Update	61 printers found
-------------	--------------------------	----------------------------	----------------------	------------------	------------------------	-------------------

Get it by

Enter Date

Methods

Screen Printing (59)
 Embroidery (46)
 Heat Transfer (31)
 Direct to Garment (15)
 Discharge Printing (14)

More Methods

3D Embroidery (13)
 Digital Printing (11)
 Sublimation (9)
 Bedazzle (2)
 Laser Etching (2)

Uses

Fundraisers (59)
 Corporate (47)
 School (46)
 Celebrations (44)
 Colleges (41)

More Uses

Teams and Jerseys (36)
 Conference Swag (13)
 School Pride (13)
 Uniforms (13)

Recommended



1 OF 2



Kinteco Screen Prin...
 35 years in business
 ★★★★★ 5.0 (1)

\$14.59 per print**26 days** delivery 09/04/2019[Choose Printer](#)

1 OF 7



Teeth Like Swords ...
 7 years in business
 ★★★★★ 5.0 (15)

\$8.00 per print**52 days** delivery 09/30/2019[Choose Printer](#)

1 OF 16



Paper Root Printing ...
 18 years in business
 ★★★★★ 4.9 (12)

\$6.00 per print**14 days** delivery 08/23/2019[Choose Printer](#)

OF 15



STEPscreen Printing
 2 years in business
 ★★★★★ 5.0 (7)

\$12.00 per print**17 days** delivery 08/26/2019[Added](#)

1 OF 5



Showbiz Screen Pri...
 25 years in business
 ★★★★★ 5.0 (2)

\$13.23 per print**19 days** delivery 08/28/2019[Choose Printer](#)

1 OF 46



School Tee Factory
 37 years in business
 ★★★★★ 5.0 (2)

\$12.00 per print**13 days** delivery 08/22/2019[Choose Printer](#)

1 OF 7



Kirkwood Trading C...
 26 years in business
 ★★★★★ 5.0 (16)

\$11.00 per print**17 days** delivery 08/20/2019[Choose Printer](#)

1 OF 11



Shirt Printing 4U, Inc
 17 years in business
 ★★★★★ 5.0 (12)

\$14.59 per print**14 days** delivery 08/23/2019[Choose Printer](#)

EXHIBIT “P”

16

REVIEWS

100% RECOMMENDED

Per Print

\$9.00

25 items, 1 color on White

Delivery in

13 days

Thursday, Aug. 22 2019

Try Price Calculator

Choose Printer

Message Printer

SHARE

YEARS IN BUSINESS

26

MEMBER SINCE

June 2019

AVERAGE PRODUCTION TIME

5 days

MINIMUM ORDER SIZE

12 Items

PROOFS DELIVERED IN 24HOURS

Yes

LOCATION

Missouri, US

STANDARD SERVICE PACKAGE

✓

Print-Ready Prep Work for Graphics

✓

Complimentary Proofs

✓

2 Proof Revisions

✓

Blank Defect Inspection

✓

Ink Color Mixing and Press Prep

✓

Flash Heat Drying

✓

Garment Folding & Packaging for shipping

SUPPORTED METHODS

Screen Printing

CUSTOM ARTWORK FEES

Review Summary

★★★★★	5 stars	100%
★★★★	4 stars	0%
★★★	3 stars	0%
★★	2 stars	0%
★	1 star	0%

16

100%

reviews recommended

Customers Reviews

Time crunch was not a problem and shirts were perfect

★★★★★ From Kim on Tue, June 25, 2019

USAGE	METHOD
Events	Screen Printing

We decided less than 1 week before a team building event that we wanted T-shirts for the event. AND there was a holiday Monday in the mix too! I found Kirkwood Trading Co via a google search, called them on a Friday and wanted the shirts delivered in CA by Wednesday. They were immediately helpful. Asked all the right questions so they could research shirt options (2 different styles, a men's and a ladies' style) in the colors we wanted that could be there to get us our shirts on time. They also beat the price I had gotten from another vendor online who was not going to be able to deliver in our desired timeframe! The shirts came out great and the team loved them! The team has commented that the quality of the shirts was very nice as well! Definitely recommend Kirkwood Trading Company. I will definitely use them again when the occasion arises...hopefully without the crazy time crunch!

Was this review helpful?

Yes

No

Case ID: 190509004

\$40.00 / hour *billed in 15 minute increments



[View Review Details >](#)

Awesome guys awesome company

★★★★★ From Joe on Tue, June 25, 2019

USAGE	METHOD
Other	Screen Printing

I started a lifestyle brand and these guys were very friendly and great at saving me money and time and headaches. They helped me with picking the right shirt for what I was trying to do and really helped with my design and put everything in place for me so I could succeed. I just met these guys a month ago and I've done 3 jobs with them and each time I'm super happy with the print be it a distressed print or a vintage look or just a typical print. I'm all over the place and it's gotten to the point where I know I can give them little instruction and they take it and run with it. It's perfect for me because I don't know a whole lot of the design part of the marketing business and these guys have been great to work with. I'm recommend them to anyone looking to order custom tees.

Was this review helpful?

Yes	No
-----	----

[View Review Details >](#)

Never disappointed

★★★★★ From Spencer on Tue, June 25, 2019

USAGE	METHOD
Colleges	Screen Printing

Unhappy with the local printer in our college town we stumbled upon Kirkwood Trading Company several years back. We have so many kids in our fraternity from St. Louis it's easy to use them for our shirts because someone is always in town to pick up the shirts. I think I'm the fourth chapter President to use these guys so we are obviously always happy. And I know when I graduate I'll be leaving their contact information for the next President because they are easy to work with and our shirts always come out great.

Was this review helpful?

Yes	No
-----	----

[View Review Details >](#)

We love our long time vendor

★★★★★ From Kelli on Wed, June 26, 2019

USAGE	METHOD
School	Screen Printing

Kirkwood Trading Company has been our high school spirit store vendor for over 10 years. I currently have the pleasure of working with them for the past 3 years. They are very easy to work with. I routinely send over several different orders at one time and they are quick to get them complete and I know they will be done right. The are great at bringing us new product ideas and helping us stay on top of the trends. Whether it's sweatshirts, t-shirts, hats, bags, or sweatpants, I'd recommend them to anyone.

Was this review helpful?

Yes	No
-----	----



[View Review Details >](#)

Team jerseys were a big hit

★★★★★ From Jessica on Tue, June 25, 2019

USAGE	METHOD
Team	Heat Transfer, Screen Printing

First time customer and no experience ordering, designing, or doing anything but wearing t-shirts. I contacted Kirkwood Trading Company for my daughters soccer team and all I had was that they wanted to be the Penguins. That's it. Matt came back with a graphic that was amazing and the girls loved it. We had them put custom names and numbers on it and my daughter and her friends where them everywhere. So we know we will be back next year when the new season starts and they grow out of these.

Was this review helpful?

Yes

No



[View Review Details >](#)

Kirkwood Trading makes ordering apparel for our swim team easy!

★★★★★ From Angie on Tue, June 25, 2019

USAGE	METHOD
Team	Screen Printing

FAST is a 350+ swimmer swim team and Kirkwood Trading Company is our source for all of our team apparel needs. Whether we need team t-shirts, an online team store to sell to the parents, or a last minute order of championship meet shirts, Kirkwood Trading Company never fails to deliver a quality product that promotes FAST swimming. Matt and Mike are quick to respond to questions to any questions FAST has and have even gone over and above to help us out with last minute orders.

Was this review helpful?

Yes

No



[View Review Details >](#)

Above and beyond

★★★★★ From Connie on Tue, June 25, 2019

USAGE	METHOD
Colleges	Screen Printing

Matt went above and beyond the call of duty. He returned my call even though they were closed on a Sunday and helped me out by getting our annual t-shirts printed in two days because I forgot

Was this review helpful?

Yes

No

to order them. We all loved the shirts and it is hard to find a company that gives this great of customer service. I am now a life long customer and would recommend Kirkwood Trading to anyone looking for shirts, great product, great price and great service. Thanks Matt and staff !!!

[View Review Details >](#)

Always fast, friendly, and on time.

★★★★★ From Jeremiah on Tue, June 25, 2019

USAGE	METHOD
Corporate	Screen Printing

I've been calling on Kirkwood Trading Company for several years now. I'm always late in calling in my shirt order because I'm busy and we go through shirts like crazy in the tree business. So one week I'm good on shirts and the next half my guys have rips and tears and sap on their shirts. So I call these guys, I tell them what I need and they get it done in a few days. No issues and I don't have to spend a lot of time as they know what I want and how I like it.



[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

Very Happy Customer

★★★★★ From Jennifer on Tue, June 25, 2019

USAGE	METHOD
Events	Screen Printing

I've been using Kirkwood Trading Company for several years and it's always been a great experience. I give them some bad artwork and they always come back with something that blows me away. No matter if one year I drop the ball and come in last minute, they are always easy to help and get things done. The shirts each time are always fantastic. Will continue using as long as I need shirts.



[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

Great shirts and easy to work with

★★★★★ From Stacey on Tue, June 25, 2019

USAGE	METHOD
Fundraisers	Screen Printing

We've been using Kirkwood Trading Company for over 5 years now. They are always easy to work with and turn our orders around very quickly. When we have questions about new products they are quick to answer and informative. When we

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

place orders they are fast the our shirts come out great every time. I'd highly recommend to anyone looking for custom t-shirts.

[View Review Details >](#)

They make my life easy

★★★★★ From Nancy on Tue, June 25, 2019

USAGE	METHOD
Celebrations	Screen Printing

I've used Kirkwood Trading Company many years for my family vacation t-shirts. I always give them my own mock up and they are able to transform it into artwork and a great t-shirt. Every year we do a different design and they have always been great about helping with a design or making our design work. The shirts are always a hit! So we keep coming back.



[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

They make use look good

★★★★★ From Rich on Tue, June 25, 2019

USAGE	METHOD
Corporate	Screen Printing

I found these guys by accident and it's been a great relationship for the past few years. They print all my corporate t-shirts and polos. They also started doing our online corporate store which saves me a ton of time and money and for that I'm grateful. Always quick to respond and never had any issues with any work they've done. A Very happy customer.

[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

good guys and great shirts

★★★★★ From John on Tue, June 25, 2019

USAGE	METHOD
Corporate	Screen Printing

Great company to work with. This was my first time dealing with Matt and the service was great. I needed a large custom order with several different kinds of apparel in a tight time frame and they came through with flying colors! Will definitely deal with Kirkwood Trading Co. again. John B. VP Sales and Marketing

[View Review Details >](#)

Was this review helpful?

<input type="button" value="Yes"/>	<input type="button" value="No"/>
------------------------------------	-----------------------------------

Very easy to work with

★★★★★ From Julie on Tue, June 25, 2019

USAGE	METHOD
School	Screen Printing

We love working with Kirkwood Trading! They designed our 3rd grade Jeff City t-shirts for 98 kids! The kids loved the shirts, we came in under budget and amazing turn around time for finished product. We highly recommend Kirkwood Trading for all your custom screen printing needs!!

Was this review helpful?

Yes

No

[View Review Details >](#)

Fast and easy

★★★★★ From Barbara on Tue, June 25, 2019

USAGE
Events

METHOD
Screen Printing

The service was fast and helpful. Both Matt and Mike made the entire process of ordering so smooth and easy. The quality of shirts was excellent and I would definitely recommend this company to anyone looking for quality custom printing.

Was this review helpful?

Yes

No

[View Review Details >](#)

Great company to work with

★★★★★ From Ashley on Tue, June 25, 2019

USAGE
Corporate

METHOD
Screen Printing

We have used KTC for a few years for our work shirts, super great customer service, fast turn around and competitive pricing! Always my go to screen printer, thanks for the great work Kirkwood Trading Company!

Was this review helpful?

Yes

No

[View Review Details >](#)

Pricing

Custom Artwork Fees: \$40.00 per hour, billed in 15 minute increments

Screen Printing

printing on a WHITE shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
12	23	\$11.00	\$12.00	\$13.00	\$14.00	\$17.00	\$18.00
24	47	\$9.00	\$11.00	\$12.00	\$13.00	\$15.00	\$16.00
48	71	\$6.00	\$7.50	\$8.00	\$8.50	\$9.50	\$10.00
72	143	\$5.85	\$6.50	\$7.45	\$8.00	\$9.10	\$9.50
144	287	\$5.50	\$6.25	\$7.25	\$7.65	\$8.25	\$9.00
288	400	\$5.25	\$6.00	\$7.00	\$7.35	\$8.00	\$8.75

printing on a DARK shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
---------	---------	---------	---------	---------	---------	---------	---------

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
12	23	\$12.00	\$13.00	\$14.00	\$15.00	\$19.00	\$22.00
24	47	\$10.00	\$12.00	\$14.00	\$16.00	\$18.00	\$20.00
48	71	\$7.00	\$9.00	\$11.00	\$13.00	\$15.00	\$17.00
72	143	\$6.00	\$8.00	\$9.00	\$11.00	\$13.00	\$15.00
144	287	\$5.85	\$7.25	\$8.00	\$9.50	\$11.75	\$13.85
288	400	\$5.50	\$7.15	\$7.74	\$9.00	\$10.00	\$11.00

About the printer



Kirkwood Trading Company
Custom T-shirts In A Few Days

No Info Provided

EXHIBIT “Q”

Add to Favorites

TEETH LIKE SWORDS
PAWTUCKET

Teeth Like Swords Printing

Specializing In Custom Small Run Prints. Please Contact Us For More Information.

15
REVIEWS

100% RECOMMENDED

<p>Per Print</p> <p>\$8.00</p> <p>25 items, 1 color on White</p>	<p>Delivery in</p> <p>52 days</p> <p>Monday, Sep. 30 2019</p>
--	---

[Try Price Calculator](#)

Choose Printer

[Message Printer](#)

SHARE

	YEARS IN BUSINESS	7
	MEMBER SINCE	July 2019
	AVERAGE PRODUCTION TIME	7 days
	MINIMUM ORDER SIZE	5 Items
	PROOFS DELIVERED IN 24HOURS	Yes
	LOCATION	Rhode Island, US

STANDARD SERVICE PACKAGE

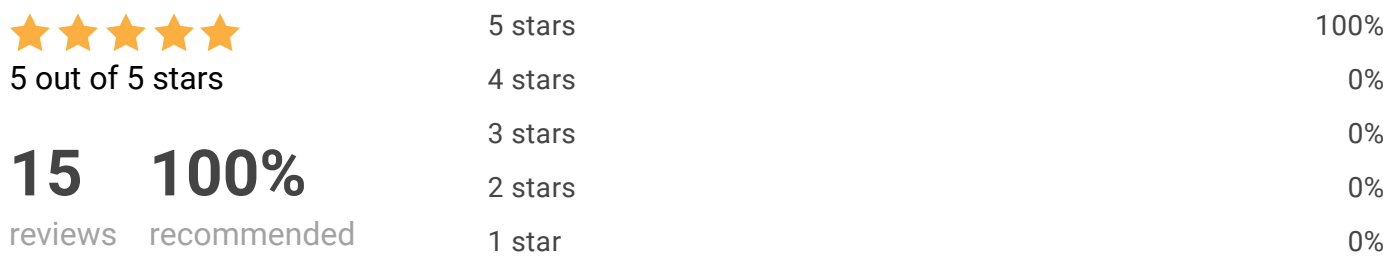
- Print-Ready Prep Work for Graphics
- Complimentary Proofs
- 2 Proof Revisions
- Blank Defect Inspection
- Ink Color Mixing and Press Prep
- Flash Heat Drying
- Garment Folding & Packaging for shipping

SUPPORTED METHODS

Screen Printing



Review Summary



Customers Reviews

My "go-to" screen printer



USAGE	METHOD
Corporate	Screen Printing

I've been getting merch printed with Teeth Like Swords since they started. They are my go-to for all shirts, posters, record covers, and any other crazy projects we can think up!

Was this review helpful?

Yes No

[View Review Details >](#)

Making it happen



USAGE	METHOD
Team	Screen Printing

CUSTOM ARTWORK FEES

\$50.00 / hour *billed in 15 minute increments

It was our first time making shirts for our small diner. We had an image and an idea and Paul really helped make it a reality. They were honest about what makes the best image and thoughtful about my vision. They were professional and pretty quick too. The final product was exactly what I wanted, and we went straight to them for our second design too!



[View Review Details >](#)

Was this review helpful?

Yes

No

Best damn shirt shop in town

★★★★★ From Eric on Fri, July 19, 2019

USAGE
Other

METHOD
Screen Printing

I’ve been buying shirts from the TLS crew for years. Always printed well, great original designs and a really helpful team. A few years ago, they had a project where designers came up with a drawing, they printed the shirts, and all profits went to local charities. I designed a shirt and had a great experience working with them through the whole process. And they ended up making a solid contribution to the local charity as well! These guys are the best around. Period.

[View Review Details >](#)

Was this review helpful?

Yes

No

The best of the best!

★★★★★ From Mike on Fri, July 19, 2019

USAGE
Other

METHOD
Screen Printing

Teeth Like Swords printed a bunch of merch for a few of my bands on numerous occasions. The turnaround has always been very fast and they are very detail oriented and very easy to work with. The end results surpassed our wildest expectations. I would highly recommend supporting Teeth Like Swords for all of your screen printing needs. I will definitely be going back to them.

[View Review Details >](#)

Was this review helpful?

Yes

No

Repeat reprinter

★★★★★ From Christine on Fri, July 19, 2019

USAGE
Other

METHOD
Screen Printing, Direct to Garment

I use TLS to print the products I sell on my etsy they have the fastest local turn around in Providence and sometimes offer local delivery! I have recommended them to several non profits I work with and everyone is very satisfied with the customer service and attention to detail their orders get.

Was this review helpful?

Yes

No



[View Review Details >](#)

We love Teeth Like Swords!

★★★★★ From Brian on Fri, July 19, 2019

USAGE: Other METHOD: Screen Printing

My band has worked with Teeth Like Swords twice to screenprint LP artwork and both times we've even been happier with how the it looks printed on the sleeve by Paul than the digital versions. They are receptive to small run projects and have very reasonable rates. Can't recommend highly enough.

Was this review helpful?

Yes

No

[View Review Details >](#)

Best around RI

★★★★★ From Eric on Fri, July 19, 2019

USAGE: Other METHOD: Screen Printing

Top notch, super fast turn around time. Had an impending deadline to get 100 shirts screenorinted and teeth like swords hopped right on it. Great quality and super easy to work with. Great experience all around and I'd definitely use them again. Cheers

Was this review helpful?

Yes

No

[View Review Details >](#)

Great quality amazing service

★★★★★ From Michael on Fri, July 19, 2019

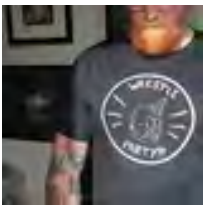
USAGE: Events METHOD: Screen Printing

Incredibly accommodating and always responsive, the shirts I've had printed came out wonderfully, clean prints, lasting image, and they're so easy to work with. The prices are amazing as well! Would rate 6 stars if that was an option!

Was this review helpful?

Yes

No



[View Review Details >](#)

Awsome company to work with

★★★★★ From James on Fri, July 19, 2019

USAGE: Other METHOD: Screen Printing

Super honest and professional! Great people to work with... really happy with shirts... turnaround time... everything! Definitely

Was this review helpful?

Yes

No

my first choice for printing

[View Review Details >](#)

Excellent shirts for my band!

★★★★★ From Eric on Fri, July 19, 2019

USAGE

METHOD

Screen Printing

These dudes did an amazing job, high quality shirts in the exact colors and inks we wanted, and done fast. Super affordable prices would definitely recommend!

Was this review helpful?

Yes

No



[Hide Review Details >](#)

Final Product	Customization Quality	Printer Response	Pr
POOR	EXCELLENT	POOR	PO

Awesome screenprinted LP jackets

★★★★★ From Jesse on Fri, July 19, 2019

USAGE

METHOD

Other

Screen Printing

Teeth Like Swords did the screenprinting for both Snowplows LP jackets. Great results, and Paul was easy to work with the whole way through. Recommended!

Was this review helpful?

Yes

No

[Hide Review Details >](#)

Final Product	Customization Quality	Printer Response	Pr
POOR	EXCELLENT	POOR	PO

Highest possible recommendation

★★★★★ From Richard on Fri, July 19, 2019

USAGE

METHOD

Other

Screen Printing

I've gone through Teeth Like Swords for different projects multiple times over the years. Always professional, always on time. 100% recommended.

Was this review helpful?

Yes

No

[View Review Details >](#)

Top Notch

★★★★★ From Jared on Fri, July 19, 2019

USAGE
Other

METHOD
Screen Printing

Fast and great service. Top notch quality printing and Paul is awesome to deal with! Highly recommended.

Was this review helpful?

Yes

No

[View Review Details >](#)

Gorgeous etchings on vinyls

★★★★★ From Jesper on Sat, July 20, 2019

USAGE

METHOD
Screen Printing, Digital Printing

The etchings on Lesseners vinyl, made my Teeth Like Swords, is one of the most beautiful things I’ve seen.

Was this review helpful?

Yes

No

[View Review Details >](#)

Quick turnaround, great prices

★★★★★ From Rob on Fri, July 19, 2019

USAGE
Events

METHOD
Screen Printing

I've used Teeth Like Swords for several jobs and I have always been happy with the work they've delivered.

Was this review helpful?

Yes

No

[View Review Details >](#)

Pricing

Custom Artwork Fees: \$50.00 per hour, billed in 15 minute increments

Screen Printing

printing on a WHITE shirt

Minimum Order Quantity: 5

Minimum	Maximum	1 color	2 color	3 color	4 color
5	19	\$10.00	\$13.00	\$17.00	\$20.00
20	49	\$8.00	\$9.50	\$11.00	\$12.50
50	74	\$6.00	\$7.50	\$9.00	\$10.50
75	99	\$5.00	\$6.50	\$8.00	\$9.50
100	149	\$4.50	\$6.00	\$7.50	\$9.00
150	200	\$4.00	\$5.50	\$7.00	\$8.50

printing on a DARK shirt

Minimum Order Quantity: 5

Minimum	Maximum	1 color	2 color	3 color
---------	---------	---------	---------	---------

Minimum	Maximum	1 color	2 color	3 color
5	19	\$12.00	\$14.00	\$16.00
20	49	\$10.00	\$11.50	\$13.00
50	74	\$8.00	\$9.50	\$13.00
75	99	\$7.00	\$8.50	\$10.00
100	149	\$6.50	\$8.00	\$9.50
150	200	\$6.00	\$7.50	\$9.00

About the printer



Teeth Like Swords Printing
Specializing In Custom Small Run Prints. Please Contact Us For More Information.

No Info Provided

EXHIBIT “R”

Add to Favorites

Paper Root Printing Co

We Treat Every Shirt We Print Like It's Going To The Red Carpet!

12
REVIEWS

100%
RECOMMENDED

Per Print

\$4.00

25 items, 1 color on
White

Delivery in

13 days







Thursday, Aug. 22
2019

[Try Price Calculator](#)

Choose Printer

[Message Printer](#)

SHARE

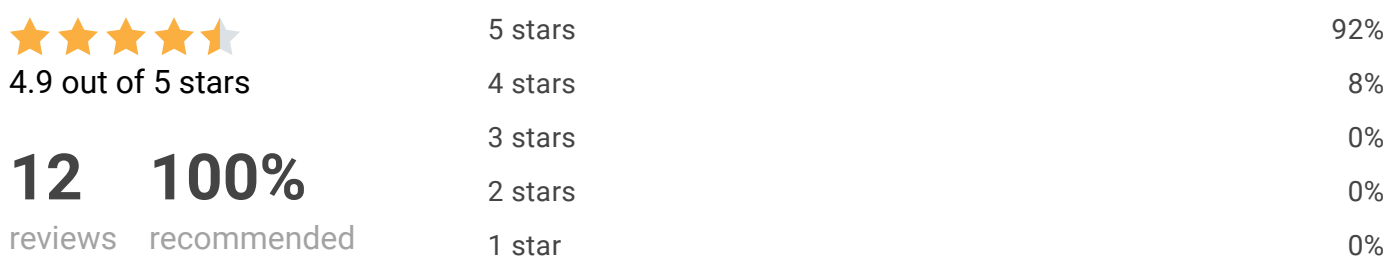
	YEARS IN BUSINESS	18
	MEMBER SINCE	July 2019
	AVERAGE PRODUCTION TIME	4 days
	MINIMUM ORDER SIZE	12 Items
	PROOFS DELIVERED IN 24HOURS	Yes
	LOCATION	Florida, US

STANDARD SERVICE PACKAGE

- ✓ Print-Ready Prep Work for Graphics
- ✓ Complimentary Proofs
- ✓ 2 Proof Revisions
- ✓ Blank Defect Inspection
- ✓ Ink Color Mixing and Press Prep
- ✓ Flash Heat Drying
- ✓ Garment Folding & Packaging for shipping

SUPPORTED METHODS

Review Summary



Customers Reviews

Paper Root helped me get started on my skateboard brand.

★★★★☆ From Henry on Fri, July 5, 2019

1 users find this review helpful

USAGE
Other

METHOD

Screen Printing, Digital Printing

I worked with Paper Root to start a lifestyle skate brand, "Winners circle." I came up with the logo and provided the digital files. All the rest was easy on my end. I even was able to feature my lifestyle brand at some events hosted in the local area! Had multiple re-orders and colors. Instagram @winnerscircletshirts

[View Review Details >](#)

Was this review helpful?

Yes

No

The perfect match of aesthetic and reliability

★★★★★ From Micah on Fri, July 5, 2019

HEAD

METHOD

Heat Transfer	Discharge Printing
Screen Printing	
CUSTOM ARTWORK FEES	
\$40.00 / hour *billed in 15 minute increments	

USAGE	METHOD
Other	Digital Printing

Paper Root always comes thru on time, with the newest technology to make the highest quality products.

Was this review helpful?

Yes

No



[View Review Details >](#)

Needed Shirts Fast

★★★★★ From Evan on Fri, July 5, 2019

USAGE	METHOD
Other	Screen Printing

I came to Greg within a week of me needing my shirts. He was very confident that he would be able to complete this task. The entire process was very professional, with some conversing about what I wanted to print on the shirts and the breakdown of sizes that wanted. The shirts were delivered on the date and time that Greg stated he could complete them by. I was amazed with the high quality results that I received in such a short time span. I am a very satisfied customer and will be returning to him for my future shirt needs.

Was this review helpful?

Yes

No

[View Review Details >](#)

Crazy soft prints and so fast!

★★★★★ From Jamie on Fri, July 5, 2019

USAGE	METHOD
Events	Screen Printing

We had a rush order for 100 tees, and we needed them by the weekend, this was a Tuesday. They helped us pick the perfect shirts and tweaked our design to make it printable. We recieved the shirts Friday of that same week and we were blown away by the quality. Paper Root has been our regular printer ever since, a real diamond in the rough. Love them!!!

Was this review helpful?

Yes

No

[View Review Details >](#)

Rad Clothing Locally

★★★★★ From Ryan on Fri, July 5, 2019

USAGE	METHOD
Other	Screen Printing, Direct to Garment

Paper Root Clothing has been making apparel for a while now here in St. Augustine and we always look to them when we need help with something or want to find a good fit. They source great materials, and are able to produce a wide variety of products.

Was this review helpful?

Yes

No

[View Review Details >](#)

★★★★★ From Tommy on Fri, July 5, 2019

USAGE	METHOD
Corporate	Heat Transfer, Screen Printing, Embroidery, Direct to Garment

Paper Root Printing has been my printer for years. They’ve always maintained their consistency, which is crucial for me when I reorder. The quality is always top notch, and I’ve never felt a need try any one else.

Was this review helpful?

Yes

No

[View Review Details >](#)

Great Quality Shirts & Printing

★★★★★ From Ice on Fri, July 5, 2019

USAGE	METHOD
Corporate	Screen Printing

Paper Root has been printing the Ice Plant's shirts and other items for over 6 years. The quality and service has been exceptional. I highly recommend Paper Root for all you printing needs.

Was this review helpful?

Yes

No

[View Review Details >](#)

Studio Director

★★★★★ From Gideon on Fri, July 5, 2019

USAGE	METHOD
Other	Screen Printing, Direct to Garment

The team at Paper Root have consistently come through for us on large and small orders – including a few rush orders! The print quality is top notch and I cannot recommend them enough.

Was this review helpful?

Yes

No

[View Review Details >](#)

Fast quality service

★★★★★ From wyatt on Fri, July 5, 2019

USAGE	METHOD
Other	Heat Transfer, Screen Printing, Digital Printing

I’ve had a couple custom shirts made by the top quality and fast service nice shirts nice printing nice service all around good service from beginning to end

Was this review helpful?

Yes

No

[View Review Details >](#)

Shirt Design

★★★★★ From Richie on Fri, July 5, 2019

USAGE	METHOD
Other	

Got mv shirts fast and on time. printing quality was excellent as

Was this review helpful?

...ing, and the printing quality was excellent as well nothing looked faded. I would recommend Paper Root to others.

Yes

No

[View Review Details >](#)

Great Work

★★★★★ From Jenn on Mon, July 15, 2019

USAGE
Other

METHOD
Screen Printing

Love Paper Root and the great work they do. Fast quotes, accurate proofs, speedy work and all around great customer service.

Was this review helpful?

Yes

No

[View Review Details >](#)

Ice Plant Vintage Bar and Dining printing

★★★★★ From Rich on Fri, July 5, 2019

USAGE
Corporate

METHOD
Screen Printing, Direct to Garment

Paper Root is our go to shop for t shirts, bags and kitchen attire. Also top quality on time work. I highly recommend

Was this review helpful?

Yes

No



[View Review Details >](#)

Pricing

Custom Artwork Fees: \$40.00 per hour, billed in 15 minute increments

Screen Printing

printing on a WHITE shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
12	23	\$6.00	\$9.00	\$12.00	\$14.00	\$16.00	\$19.00
24	47	\$4.00	\$5.50	\$6.50	\$7.50	\$8.50	\$9.50
48	71	\$2.95	\$3.95	\$4.95	\$5.95	\$6.95	\$7.95
72	143	\$2.50	\$3.50	\$4.50	\$5.50	\$6.50	\$7.50
144	287	\$2.10	\$3.10	\$4.10	\$5.10	\$6.10	\$7.10
288	500	\$1.80	\$2.80	\$3.80	\$4.80	\$5.80	\$6.80

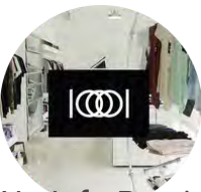
printing on a DARK shirt

Minimum Order Quantity: 12

Minimum	Maximum	1 color	2 color	3 color	4 color	5 color	6 color
---------	---------	---------	---------	---------	---------	---------	---------

Minimum 12	Maximum 23	1 color \$7.00	2 color \$10.00	3 color \$13.00	4 color \$15.00	5 color \$17.00	6 color \$20.00
24	47	\$5.00	\$6.50	\$7.50	\$8.50	\$9.50	\$10.50
48	71	\$3.95	\$4.95	\$5.95	\$6.95	\$7.95	\$8.95
72	143	\$3.50	\$4.50	\$5.50	\$6.50	\$7.50	\$8.50
144	287	\$3.10	\$4.10	\$5.10	\$6.10	\$7.10	\$8.10
288	500	\$2.80	\$3.80	\$4.80	\$5.80	\$6.80	\$7.80

About the printer



Paper Root Printing Co

We Treat Every Shirt We Print Like It's Going To The Red Carpet!

No Info Provided

EXHIBIT “S”

About 173,000 results (0.39 seconds)

JiffyShirts.com | T-Shirts For Cheap At \$1.75

www.jiffyshirts.com/Apparel/Online

We Offer Fashionable, Comfortable and High-Quality T-Shirts For Both Men and Women. Fast Delivery, Bulk Discounts, Always In Stock & Cheapest Prices. Buy Today. Ships today. Free shipping & Returns. Bulk discounts. Brands: Hanes, Gildan, Fruit Of The Loom.

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Wholesale Blank Shirts - JiffyShirts.com

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JiffyShirts.com has the lowest prices fastest delivery. Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee Shirts, knit shirts, fleece pullovers, denim ...

Bella+Canvas

Ladies' Jersey Short-Sleeve Deep V-Neck T-Shirt. Bella+Canvas ...

Gildan

Top Seller; Sale. Adult Unisex Heavy Cotton™ 5.3 oz. T-Shirt ...

Blank T-Shirts

Gildan G500 Corn Silk - Gildan G640 Heather Berry - Sweatshirts

Kid's Shirts

Shop for cheap Blank Shirts, T-shirts, polo shirts, jackets, Tee ...

Women

JiffyShirts.com has the lowest prices fastest delivery. Shop for ...

Customer Service

Contact Us. We are proud to offer the finest selection of blank ...

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About 46,400,000 results (0.57 seconds)

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us.shein.com/

Discover Affordable Women **Clothes** Available In Various Colors, Styles and Sizes Online. Free return & free shipping on women's **clothing** at SHEIN.Up to 85% Off, Shop Now. Free Return.

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Ad

www.jiffyshirts.com/Apparel/Online

Fast Delivery, Bulk Discounts, Always In Stock & **Cheapest** Prices. Buy Today. We Offer...

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Ad

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Types: T-shirts, Dresses, Sweaters, Sweatshirts, Swimwear, Bottoms, Mens. Free Shipping...

15 Cheap Clothing Websites to Shop on a Budget - Cheap ...


https://www.cosmopolitan.com › style-beauty › fashion › cheap-clothing-f... ▾

Apr 19, 2019 - If you love shopping for new **clothes** but hate looking at your bank account balance after, I have news for you: There are so many websites out ...

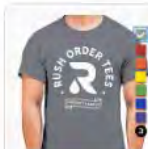
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What is the cheapest brand of clothes?


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Hooded Sweatshirt...
\$7.96
BulkApparel.com




Gildan Adult Ultra Cotton...
\$2.96
RushOrderTees
Free shipping




Gildan Ultra Cotton T-shirt ...
\$3.83
Custom Ink
★★★★★ (368)



Cheapest Custom T-Shirts
\$2.95
AlliedShirts.com
★★★★★ (455)



Ditsy Print Smock Cami...
\$8.95
ROMWE



Leopard Print Legging...
\$5.00
SHEIN

Case ID: 190509004



jiffy shirts gildan hoodie








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About 52,400 results (0.41 seconds)

See jiffy shirts gildan hoodie

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Hooded Sweatshirt... \$7.96 BulkApparel.com	Hoodies wholesale \$7.96 BulkApparel.com	Gildan 18500 - Heavy Blend... \$10.68 Wordans.com ★★★★★ (326)	Gildan Adult Heavy Blend 8... \$12.14 ShirtSpace ★★★★★ (326)	Gildan Midweight... \$16.62 Custom Ink ★★★★★ (326)

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Gildan G185 Adult Heavy Blend™ 8 oz., 50/50 ... - Jiffy Shirts

<https://www.jiffyshirts.com/gildan-G185>

★★★★★ Rating: 4.8 - 3,908 reviews - \$12.11 to \$17.06 - In stock

Adult Unisex Heavy Blend™ 8 oz., 50/50 Hood. Gildan. Style : G185. Rating : Recently however, I've noticed that all these hoodies are pilling. I'm not sure if ...

Color: \$12.11 Gray: \$11.96

White: \$10.37

JiffyShirts.com: Brand is Gildan

<https://www.jiffyshirts.com/brand=Gildan>

EXHIBIT “T”

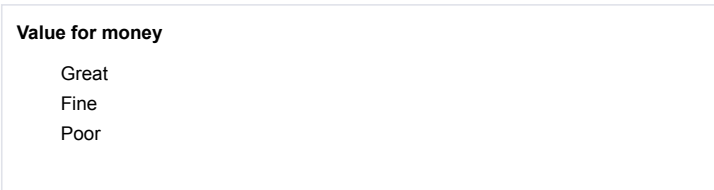
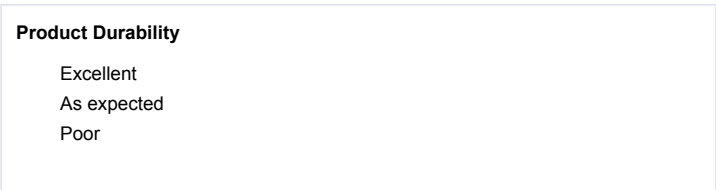
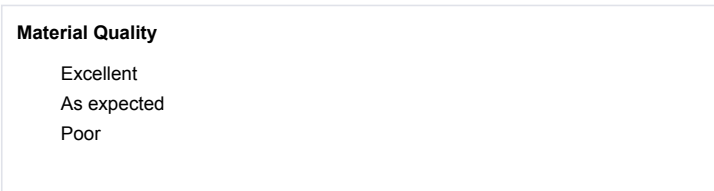
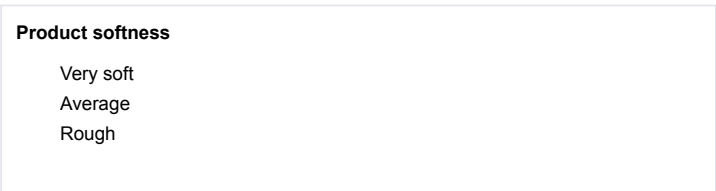
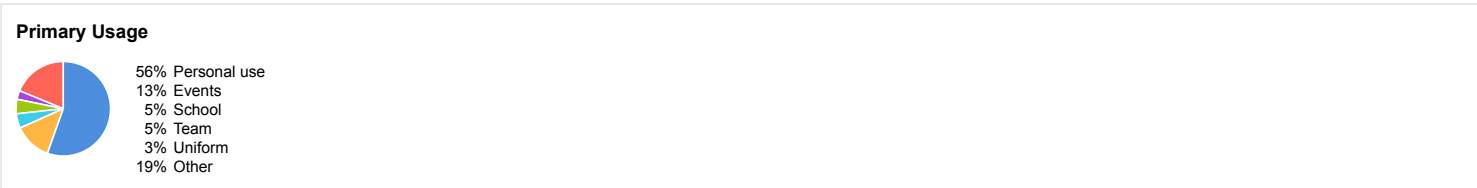
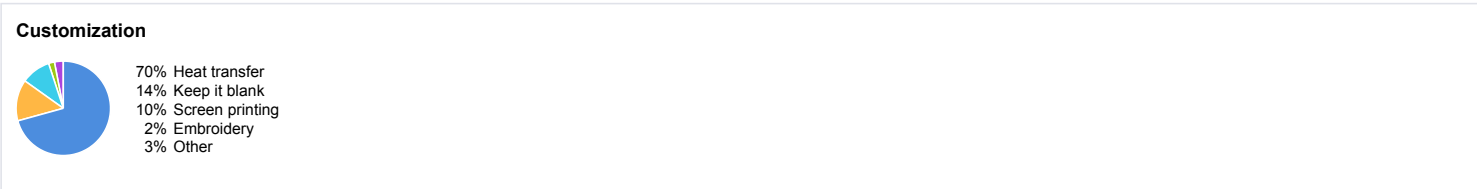
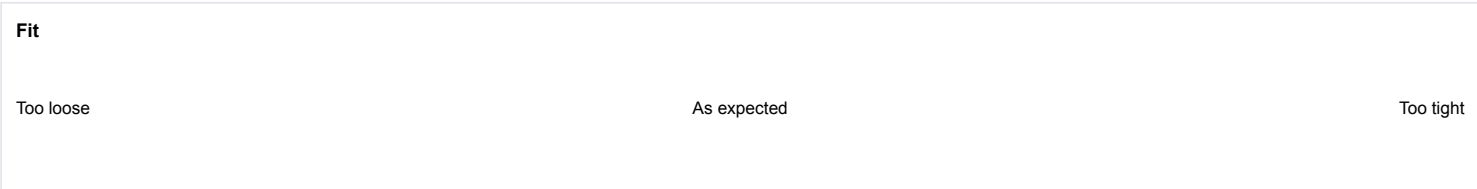
Review Summary

★★★★★
4.8 out of 5 stars

5 stars 0% 83%4 stars 13%3 stars 2%2 stars 0%1 star

17,407
reviews


98%
recommended



Customer Reviews

Nice
★★★★★
from Keonna on Tue, Mar. 27, 2018

4.8 ★★★★★
Google
Customer Reviews
Case ID: 190509004

 128 orders
33 reviews


Nice fit

Was this review helpful?

Once again... I am happy!



from Rikki on Fri, Mar. 23, 2018

 29 orders
24 reviews

Love it!


Was this review helpful?

[View review details](#)

Great product



from Gwendolyn on Sat, Mar. 17, 2018

 1 order
2 reviews

Printing


Was this review helpful?

[View review details](#)

Great shirts!



from Heather on Mon, Mar. 12, 2018

 92 orders
67 reviews

Love!!!!


Was this review helpful?

[View review details](#)

Perfect



from Brittany on Tue, Mar. 6, 2018

 86 orders
37 reviews

awesome!

Was this review helpful?

[View review details](#)

Great product




from Robert on Thu, Mar. 1, 2018

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

 57 orders
87 reviews

good fit


Was this review helpful?

[View review details](#)

Grey



from Danielle on Sat, Jan. 27, 2018

 16 orders
7 reviews


Loved it

Was this review helpful?

Great T shirt



from Kelly on Sun, Jan. 14, 2018

 246 orders
98 reviews

runs big


Was this review helpful?

[View review details](#)

Love the graphite heather!



from Dakota on Mon, Jan. 8, 2018

 47 orders
19 reviews


Perfect!

Was this review helpful?

Fast shipping



from Ashley on Thu, Jan. 4, 2018

 194 orders
2 reviews

Love it!


Was this review helpful?

[View review details](#)

Good tee



from Roberto on Wed, Dec. 27, 2017

 68 orders
38 reviews

4.8 
Google

Customer Reviews

Case ID: 190509004

good tee

Was this review helpful?

Yes

No

[View review details](#)

Great



from Andrea on Fri, Dec. 15, 2017



79 orders

45 reviews

Love it!

Was this review helpful?

Yes

No

[View review details](#)

T-shirt



from Luz on Wed, Nov. 22, 2017



29 orders

17 reviews

Good buy

Was this review helpful?

Yes

No

[View review details](#)

Good



from Jennifer on Thu, Nov. 16, 2017



63 orders

38 reviews

Good fit

Was this review helpful?

Yes

No

[View review details](#)

Awesome!



from Deborah on Tue, Oct. 24, 2017



194 orders

189 reviews

Awesome!

Was this review helpful?

Yes

No

[View review details](#)

Good colors




from Tanesha on Mon, Oct. 23, 2017

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

 33 orders
48 reviews

GOOD FIT


Was this review helpful?

[View review details](#)

Awesome



from Eboney on Sat, Sep. 23, 2017

 167 orders
91 reviews

Loved it


Was this review helpful?

[View review details](#)

DI;/c ,.cx



from Tynesha on Wed, Sep. 13, 2017

 174 orders
69 reviews

fksx; x;


Was this review helpful?

[View review details](#)

Great products



from Deanthony on Mon, Sep. 11, 2017

 53 orders
84 reviews


Flawless

Was this review helpful?

GREAT BRAND



from Rondanika on Mon, Aug. 28, 2017

 185 orders
114 reviews


favorite

Was this review helpful?

Stack or starve



from Dominic on Sat, Aug. 19, 2017

 6 orders
1 review

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

Business

Was this review helpful?

[View review details](#)

Great Tee!



from Amanda on Fri, Aug. 11, 2017

77 orders
75 reviews

Perfect!

Was this review helpful?

[View review details](#)

Perfect



from Terra on Mon, July 31, 2017

92 orders
1 review

Perfect

Was this review helpful?

[View review details](#)

Tshirt



from Taylor on Sun, June 25, 2017

113 orders
70 reviews

Good fit

Was this review helpful?

[View review details](#)

Tshirt



from Taylor on Sun, June 11, 2017

113 orders
70 reviews

Good fit

Was this review helpful?

[View review details](#)

Durable




from Terrance on Mon, May 15, 2017

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

 243 orders
86 reviews

Quality


Was this review helpful?

[View review details](#)

Quality tee



from Angela on Fri, May 12, 2017

 219 orders
152 reviews

good tee


Was this review helpful?

[View review details](#)

Awesome



from Stephanie on Fri, Apr. 28, 2017

 70 orders
16 reviews

Awesome


Was this review helpful?

[View review details](#)

Satisfied customer



from Shataundia on Tue, Apr. 25, 2017

 1 order
1 review

Perfect


Was this review helpful?

[View review details](#)

Awesome!



from Deborah on Mon, Apr. 24, 2017

 194 orders
189 reviews

Awesome!

Was this review helpful?

[View review details](#)

Navy tee




4.8 

Google

Customer Reviews

Case ID: 190509004

from Jeniffer on Mon, Apr. 17, 2017

 8 orders
6 reviews

Navy tee


Was this review helpful?

 [View review details](#)

Awesome!



from Deborah on Mon, Apr. 10, 2017

 194 orders
189 reviews

Awesome!


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Mon, Mar. 27, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Loving it



from Conkichi on Tue, Mar. 21, 2017

 41 orders
7 reviews

Love it


Was this review helpful?

 [View review details](#)

Great TEE



from Jessica on Mon, Mar. 13, 2017

 54 orders
26 reviews

BEST TEE

Was this review helpful?

 [View review details](#)

Awesome!

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004



from Deborah on Thu, Mar. 9, 2017

194 orders
189 reviews

Awesome!

Was this review helpful?

[View review details](#)

Great



from Melanie on Fri, Feb. 10, 2017

54 orders
32 reviews

monogram

Was this review helpful?

Great



from Melanie on Fri, Feb. 10, 2017

54 orders
32 reviews

monogram

Was this review helpful?

Awesome!



from Deborah on Mon, Feb. 6, 2017

194 orders
189 reviews

Awesome!

Was this review helpful?

[View review details](#)

Great quality



from Kathryn on Fri, Feb. 3, 2017

20 orders
1 review

Perfect!

Was this review helpful?

[View review details](#)

Heavy Cotton™ 5.3 oz. T-Shirt G500




from Sandee on Fri, Dec. 30, 2016

4.8 ★★★★★
Google


Customer Reviews

Case ID: 190509004

 2 orders
5 reviews

Business


Was this review helpful?

 [View review details](#)

Awesome!



from Deborah on Thu, Dec. 29, 2016

 194 orders
189 reviews

Awesome!


Was this review helpful?

 [View review details](#)

Awesome!



from Deborah on Tue, Dec. 27, 2016

 194 orders
189 reviews

Awesome!


Was this review helpful?

 [View review details](#)

Excellent



from Marlon on Tue, Dec. 20, 2016

 8 orders
1 review

Work use


Was this review helpful?

 [View review details](#)

Tees



from Helen on Thu, Oct. 27, 2016

 59 orders
15 reviews

Good!!!!

Was this review helpful?

 [View review details](#)

Tshirt




4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

from Cynthia on Thu, Oct. 20, 2016

 9 orders
2 reviews

love it


Was this review helpful?

 [View review details](#)

Awesome!

☆☆☆☆☆

from Dale on Wed, Nov. 23, 2011

 1 order
1 review


Awesome!

Was this review helpful?

Great!!!

★★★★★

from Rita on Wed, Nov. 23, 2011

 1 order
1 review


great!!!

Was this review helpful?

Loved it

★★★★★

from Sandra on Wed, Nov. 23, 2011

 1 order
1 review


Loved it

Was this review helpful?

All good

★★★★★

from Derick on Sun, June 6, 2010

 1 order
1 review

all good

Was this review helpful?

EXHIBIT “U”

Review Summary



4.8 out of 5 stars

5 stars

0%

83%4 stars

13%3 stars

2%2 stars

0%1 star

17,407

reviews

98%

recommended

Fit

Too loose

As expected

Too tight

Shrinkage

Less

As expected

More

Customization



70% Heat transfer
14% Keep it blank
10% Screen printing
2% Embroidery
3% Other

Primary Usage



56% Personal use
13% Events
5% School
5% Team
3% Uniform
19% Other

Product softness

Very soft
Average
Rough

Material Quality

Excellent
As expected
Poor

Product Durability

Excellent
As expected
Poor

Value for money

Great
Fine
Poor

Customer Reviews

Love the shirt




from Stacy on Thu, Apr. 20, 2017

4.8 ★★★★★

Google

Customer Reviews

 1 order
8 reviews

Leisure


Was this review helpful?

[View review details](#)

Awesome



from Deborah on Wed, Apr. 19, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

[View review details](#)

Awesome



from Deborah on Mon, Apr. 17, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

[View review details](#)

Tshirt



from Monica on Sat, Apr. 15, 2017

 82 orders
24 reviews

Perfect


Was this review helpful?

[View review details](#)

Love it!



from Chandra on Fri, Apr. 14, 2017

 109 orders
12 reviews

Love it

Was this review helpful?

[View review details](#)

Durable




4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

from Ardeart on Mon, Apr. 10, 2017

 243 orders
86 reviews

Quality


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Thu, Apr. 6, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Great!



from Tonya on Wed, Apr. 5, 2017

 1 order
2 reviews

I love!


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Tue, Apr. 4, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

AMAZING!



from Jessica on Tue, Apr. 4, 2017

 6 orders
7 reviews

Awesome

Was this review helpful?

 [View review details](#)

Awesome


4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004



from Deborah on Thu, Mar. 30, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Fri, Mar. 24, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Awesome



from Deborah on Sun, Mar. 19, 2017

 194 orders
189 reviews

Awesome


Was this review helpful?

 [View review details](#)

Excellent



from Ardeart on Wed, Mar. 8, 2017

 243 orders
86 reviews

Quality


Was this review helpful?

 [View review details](#)

Loved i!



from Ashley on Wed, Mar. 8, 2017

 63 orders
47 reviews

love it

Was this review helpful?

 [View review details](#)

4.8 ★★★★★

Google

Customer Reviews

Case ID: 190509004

Awesome



from Deborah on Mon, Mar. 6, 2017



194 orders
189 reviews

Awesome

Was this review helpful?

[View review details](#)

Nice



from Ardeart on Wed, Mar. 1, 2017



243 orders
86 reviews

Quality

Was this review helpful?

[View review details](#)

Repeat customer



from Termica on Sun, Feb. 26, 2017



5 orders
5 reviews

Love it

Was this review helpful?

[View review details](#)

Awesome



from Deborah on Thu, Feb. 23, 2017



194 orders
189 reviews

Awesome

Was this review helpful?

[View review details](#)

Awesome



from Deborah on Wed, Feb. 15, 2017



194 orders
189 reviews

Awesome

Was this review helpful?

[View review details](#)

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

Fast shipping. Great quality



from Camica on Sun, Jan. 29, 2017



146 orders
25 reviews

Love it

Was this review helpful?

Yes

No

[View review details](#)

AWESOME



from Deborah on Thu, Jan. 12, 2017



194 orders
189 reviews

aWESOME

Was this review helpful?

Yes

No

[View review details](#)

Awesome



from Deborah on Mon, Jan. 2, 2017



194 orders
189 reviews

Awesome

Was this review helpful?

Yes

No

[View review details](#)

Red



from Rebekah on Sun, Dec. 18, 2016



6 orders
3 reviews

Awesome

Was this review helpful?

Yes

No

[View review details](#)

Red



from Rebekah on Sun, Dec. 18, 2016



6 orders
3 reviews

Awesome

Was this review helpful?

Yes

No

[View review details](#)

4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004

Quality



from Ardeart on Tue, Nov. 8, 2016

243 orders
86 reviews

Quality

Was this review helpful?

[View review details](#)

Love this!!!



from Gabrielle on Mon, Oct. 24, 2016

37 orders
6 reviews

Love it

Was this review helpful?

[View review details](#)

Useful



from Pedro on Thu, Oct. 20, 2016

25 orders
18 reviews

Good 😊

Was this review helpful?

[View review details](#)

Awesome



from Wallace on Mon, Dec. 19, 2011

1 order
1 review

awesome

Was this review helpful?

Love it



from Mica on Sun, Jan. 11, 2009

1 order
1 review

Love it

Was this review helpful?

Perfect




4.8 ★★★★★

Google

Customer Reviews

Case ID: 190509004

from Dick on Tue, Nov. 25, 2008

 1 order
1 review


Perfect

Was this review helpful?

Longer.



from Abbi on Fri, Nov. 21, 2008

 1 order
1 review


Longer.

Was this review helpful?

Satisfied



from Lateia on Fri, Apr. 12, 2019

 11 orders
1 review



Was this review helpful?

[View review details](#)

Awesome



from Patricia on Wed, Jan. 30, 2019

 6 orders
1 review

Awesoy


Was this review helpful?

[View review details](#)

Happy



from Naomi on Sat, Nov. 3, 2018

 14 orders
4 reviews

Great!


Was this review helpful?

[View review details](#)

Love



from Shaiha on Thu, Nov. 1, 2018

 20 orders
8 reviews

4.8 

Google

Customer Reviews

Case ID: 190509004

Huhjjj



Was this review helpful?

Yes

No

[View review details](#)

Great



from Luz on Sat, Aug. 25, 2018



5 orders

1 review

Great!

Was this review helpful?

Yes

No

[View review details](#)

Great value!



from Nicole on Wed, July 25, 2018



121 orders

93 reviews

Great!

Was this review helpful?

Yes

No

[View review details](#)

Nice



from Ricardo on Wed, June 20, 2018



14 orders

13 reviews

thanks

Was this review helpful?

Yes

No

[View review details](#)

Great value!



from Nicole on Mon, May 7, 2018



121 orders

93 reviews

Great!

Was this review helpful?

Yes

No

[View review details](#)

Gildan shirts

4.8 ★★★★★


Google

Customer Reviews

Case ID: 190509004



from Paula on Sun, Apr. 1, 2018

 38 orders
14 reviews

I have


Was this review helpful?

[View review details](#)

Sport Grey



from Brandy on Tue, Mar. 20, 2018

 90 orders
35 reviews

Custom


Was this review helpful?

[View review details](#)

Great!



from Taylor on Wed, Feb. 21, 2018

 10 orders
7 reviews

Great!


Was this review helpful?

[View review details](#)

Excellent shirts



from Casi on Wed, Feb. 14, 2018

 1 order
3 reviews

Great!


Was this review helpful?

[View review details](#)

Nice affordable shirt.



from Rebecca on Sat, Jan. 6, 2018

 7 orders
7 reviews

Great!

Was this review helpful?

Great


4.8 ★★★★★
Google

Customer Reviews

Case ID: 190509004



from Katie on Fri, Dec. 1, 2017

 16 orders
12 reviews


Great!

Was this review helpful?  [View review details](#)

Shirts



from Lauren on Sun, Oct. 8, 2017

 11 orders
12 reviews


Lovely

Was this review helpful?  [View review details](#)

Jnj , ,



from Tynesha on Fri, Sep. 29, 2017

 174 orders
69 reviews


InInkl

Was this review helpful?  [View review details](#)

Great!



from Maria on Mon, Sep. 4, 2017

 86 orders
164 reviews


Great!

Was this review helpful?

Men's shirt



from Grenisha on Fri, Aug. 11, 2017

 11 orders
3 reviews

Great!

Was this review helpful?  [View review details](#)

CERTIFICATE OF SERVICE

I hereby certify that I electronically filed *Defendants' Motion and Memorandum of Law under Rule 12(b)(6) and 12(f)* with the Clerk of Court using the CM/ECF system, and I hereby certify that I have thereby electronically served this document upon all counsel of record who are registered with the Court's CM/ECF system.

/s/ Larry M. Keller

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Counsel for Defendants

Dated: February 18, 2020